

**Canadian Grain Commission**

**Employment Equity**  
**EMPLOYMENT SYSTEMS REVIEW**

Prepared for:

**Canadian Grain Commission**

By:

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## EXECUTIVE SUMMARY

The *Employment Equity Act (the Act)* brings the Public Service under its jurisdiction. The Canadian Human Rights Commission (CHRC) audits the Public Service to ensure conformance to *the Act's* requirements. Responsibility for conformance falls primarily on individual Departments and Agencies. Two key requirements of *the Act* are to

- Conduct a workforce analysis to identify areas of under-representation for the four designated groups (aboriginal peoples, visible minorities, persons with disabilities, and women); and
- Conduct an Employment Systems Review (ESR) to “identify employment barriers against persons in designated groups”. Once barriers are identified, there is an obligation to remove them.

*The Canadian Grain Commission was recently audited by the CHRC, and was found not to have conducted the required Employment Systems Review (ESR) or Workforce Analysis. Several other areas of non-compliance were also identified. This report addresses the requirement to conduct an ESR. It draws on the Workforce Analysis, delivered under separate cover.*

To completely fulfill the requirements emerging from the audit, the CGC must consider the recommendations of this report, modify them as it feels is appropriate, and incorporate the resulting action plan and goals into its Employment Equity Plan. The CGC must also commit to short-term numerical goals (within three years) for reducing the gaps in representation of designated groups.

### Progress on Representation

Required investigation and action is driven by the number of categories where the CGC is under-represented. *The CGC has made substantial progress in its representation in the 20 months since March 31, 1999, the date of the last estimates by Treasury Board Secretariat and the Public Service Commission.* The following improvements are noted:

- **Gaps in Aboriginal Representation have been eliminated.** Improved recruiting of Aboriginal employee has eliminated the former gap in aboriginal grain inspectors (the Technical occupation category).
- **Gaps for Persons with Disabilities have effectively been eliminated.** Half the gap was eliminated due to improved workforce survey and self-identification. In addition further analysis by Hara Associates has identified an overstatement in the benchmark for representation among weighers (GLGHW). The corrected gap estimate was a shortfall of one person with disabilities in the Operations category (includes weighers), an amount that is within acceptable random variation.
- **Gap for Women in Scientific and Professional has been eliminated.** A previous shortfall of two women employees has been eliminated through better recruiting and retention.
- **Representation of Women PIs has improved.** The shortfall in women has dropped from 28 to 22.
- **Slight improvement for Visible Minorities.** The overall shortfall for the CGC has declined from 47 to 44.

Note that the shortfalls are determined by comparison to equivalent occupations in the same geographic regions as the CGC.

These gains allow the CGC to focus its attention on the remaining serious representation problems. As discussed in the Workforce Analysis (separate cover) these are:

**Table E-1: Current Areas of Under-representation**

Group	Under-Represented Occupational Category (* indicates below 80% of representative (-) is shortfall in number of people	Observations
Women	Technical (-22)	X PI group is main issue. Gaps concentrated in BC, Alberta, Manitoba, Quebec. Thunder Bay is adequate. X Recruiting of PI s also poor, driven by poor BC recruiting. X Promotions low in Administration. X High departures among women Weighers in Ontario.
Members of Visible Minorities	*S&P (-6) *Admin&FS(-2) *Technical (-30) *Operational (-6)	X Bulk of shortfalls in BC & Manitoba X Key groups: PI, GLHW, SERES, CH X Recruiting also poor, reflecting same shortfall groups and regions. X Promotion shares also poor. Visible Minorities concentrated in bottom levels of PI group. X High departures in S&P.

**Action Required on Remaining Gaps – Waiting Will Not Produce Change**

Despite recent progress, current recruitment of women and visible minorities in the above areas is still unrepresentative. Because recruitment and retention are unrepresentative, representation is unlikely to improve further unless actions are taken, such as the removal of employment barriers identified in this report.

*In addition, action is also required on the recruitment of persons with disabilities.* The record shows zero recruits over three years ending November 2000. Although the aging workforce has ensured that the CGC has no under-representation of persons with disabilities, there is a separate duty under the *Employment Equity Act* to remove barriers not related to merit. The zero recruiting rate indicates the likelihood of such barriers.

The ESR investigates reasons for under-representation in three chapters: visible minorities, women, and persons with disabilities.

**Themes from the Review**

The following are broad themes from the review:

- **General goodwill tempered by misunderstandings of EE.** Employees, managers and human resources advisors showed a great degree of goodwill in interviews. The legitimacy of employment equity concerns was generally well accepted on principal, but there were also significant concerns by managers and non-designated group employees about how EE was being implemented. Much of this was based on misunderstandings of how the policies operate and are supposed to be implemented. A lack of in-depth awareness of *the Employment Equity Act* was frequently expressed by managers, and misconceptions about the goals of *the Act* were often expressed by employees.

- **Some barriers easy to remove.** The ESR found that there were recruitment procedures and other practices that were significant barriers to recruitment, and could easily be corrected. For example, the PI inventories of candidates are not advertised to the general public in most regions.
- **Strong corporate culture issues.** While individuals do not view themselves as racist or sexist, there are strong cultural assumptions that lead to practices adverse to visible minorities and women. Combined with misunderstandings about EE, they also lead to unnecessary resistance to initiatives to correct under-representation.
- **Vestiges of a male dominated culture remain.** Lack of awareness has contributed to misconceptions about Employment Equity in the CGC work culture, impacting on the integration of female employees into the workforce.
- **Employment equity principles – including relationship to merit - needs to be communicated to Employees.** Despite efforts, such as including an Employment Equity section on the CGC website, most employees remain ignorant of the principles of Employment Equity. Many misconceptions about *the Act* persist. While all employees have e-mail addresses, few who work on the waterfronts or in labs have private or regular access to their e-mail, let alone the Internet. A more effective means of communication needs to be developed.
- **Employment equity widely perceived as being Human Resources driven - this needs to change.** Current perception by managers places responsibility and direction in the Human Resources function. This needs to change. Practices and representation cannot change without the active participation of managers, who do the hiring and carry out the CGC's daily business.
- **Improvements in staffing practices by managers needed.** Interviews and reviews of competition files revealed that broad improvement is necessary in basic staffing practices. This goes beyond EE, but is a concern for fair hiring practices consistent with employment equity.
- **Improvements in human resources systems needed.** A variety of systems improvements are recommended, ranging from establishing a framework for registering CGC human resources policies, to accommodation policy.
- **Training Needs Identified.** Some training needs are identified, ranging from diversity management training to refresher training on general human resources practices for managers.

*Perhaps the most important finding is that there is a significant cultural lag among the many small units that make up the operating centers of the CGC. Employees and managers recognize the validity of the concerns of the designated groups, but many have strong misconceptions about designated groups, and misunderstandings of how employment equity is to operate in conjunction with merit. As a result there is great deal of potential resistance to changing systems and practices to address the real barriers faced by women, aboriginal peoples, persons with disabilities, and members of visible minorities. On the other hand, many of the measures proposed in this report are to improve the fairness and openness of competitive hiring, something that almost all employees would definitely support.*

*The challenge is to design a program that addresses the barriers identified by the ESR, and at the same time constructively communicates the intentions of the measures, and their fairness. The recommendations of the report include measures directed at communication, either through introduction of the EE plan or through training integrated with broader human resources objectives.*

## **DIRECT APPOINTMENTS *NOT* RECOMMENDED**

Appointing designated group candidates without competition is sometimes recommended to correct serious cases of under-representation in a reasonable period of time. The project team does not recommend this for the CGC.

The ESR identified significant barriers that the CGC can feasibly address. The first step should be to remove the significant barriers identified and allow designated group candidates the fair chance to compete for jobs. Other recommendations work within the merit framework, such as by enriching the candidate pool of designated group candidates through outreach.

Appointment without competition is viewed as a last resort should the CGC systems not respond to the programs, and continue to display a lack of representation. It is recognized that appointments without competition can create difficult situations for those appointed, and have negative impacts on the achievement of the long run goals of employment equity. However, the report also recommends ensuring that the CGC has access to the necessary authorities as a back-up measure should efforts to improve representativeness fail.

## **FINDINGS AND RECOMMENDATIONS**

The report makes 46 detailed recommendations. These are listed in the final chapter. Key findings and recommendations are summarized below:

## **General**

The ESR found that the CGC largely recruits from the grain industry itself, particularly for the under-represented areas of PIs and GLGHWs. Advertising is largely through word of mouth in the industry. Informal practices on selection boards leave selection methods open to favoring those with industry or family connections, or leave methods of selection undocumented. The ESR recommends ensuring that entry level opportunities are made known to the general public.

A more representative group of applicants will pose challenges to the CGC. Interviews and the review of competition files revealed that selection board practices and other staffing practices need to be upgraded and standardized. Several recommendations are aimed at this, including refresher training in staffing practices for managers. This will also assist the CGC in other areas, such as meeting the requirements of the new staffing delegation agreement with the PSC.

Improvements in basic staffing practices are complemented by recommended training in managing diversity for managers and human resources officers, particularly with respect to cross-cultural interview techniques and gender in the workplace.

Once candidates are recruited, the ESR identified concerns regarding equal access to the on-the-job training that must occur for individuals to advance as Inspectors or Weighers. Establishing formal expectations for both new recruits and their supervisors is recommended.

In addition, it is recommended that employment equity and improved representation be incorporated into management performance agreements, particularly in those branches and regions where there is a high degree of under-representation.

Improved collection of self-identification information is also recommended to support assessment of whether measures to remove barriers to designated group candidates are working.

## **Visible Minorities**

Visible minorities are under-represented in most CGC occupational categories (see Table E-1).

Opening up advertising of positions is expected to achieve a great deal in itself, as will addressing some of the human resource practices discussed above. In addition, an outreach program to encourage applications is recommended for regions with significant visible minority populations.

The ESR also identified some specific barriers for visible minorities. These included portions of the PI aptitude test, a lack of training for managers in cross-cultural interview techniques (crucial for assessing both personal suitability and competence).

In addition, to address the specific shortfall of visible minorities among CGC research scientists and chemists, a graduate scholarship program is recommended. For scientific support staff, such as EGs, there is a separate concern about low representation in promotions. To ensure a level playing field, a policy ensuring a minimum number of professional development days is recommended, along with including managers of scientific support staff in the recommended diversity management training.

## Women

Women are under-represented in the Technical category (PIs). Recruiting of PIs is also unrepresentative. The ESR found significant issues regarding perceptions of women and the workplace culture in the PI work environment. PI women have a fair share of promotions, but this appears to be in spite of the issues identified.

Recommendations take two forms: improving the environment for current PI women, and removing barriers to recruiting a more representative proportion of women.

To improve the environment for current PI women, there needs to be a better understanding of why and how to maintain a workplace welcome to both genders at the immediate supervisory level. It is recommended that the diversity management training for managers should be extended to PI supervisory level and include a component on gender. It is also recommended that the policy on harassment be broadened and re-circulated. In addition, a firmer approach should be taken by CGC senior management on the question of pin-ups and other material posted in the private sector grounds of grain terminals. This is important both for according all CGC the professional respect they deserve, and to clarify in a broader sense what CGC management finds acceptable. Approaches consistent with jurisdictional issues are provided in the full text of the recommendation.

In terms of recruiting a greater proportion of women, this report recognizes that the industrial work environment, the shift work, and the over-time, make the occupation of grain inspector less attractive for women. However, this is also true of other types of food inspectors and graders used for comparison to the CGC. There remain specific barriers for women to enter this occupation with the CGC that are causing under-representation *relative to equivalent jobs*.

In addition to the recommended improvements in the work culture, interview techniques, and approach to PI training, the following are recommended:

- **Subject to operational requirements, adopt a family-friendly shift allocation policy.** This should apply to both sexes. The report recognizes the operational requirement of shifts and overtime in the environment the CGC serves. However, we also note that the CGC will face greater challenges in retaining PIs of both sexes as the family structure of Canadians continues to move away from the traditional single-earner with a stay-at-home partner. If the CGC expects its PIs to make grain inspection a long term choice, shift policy must recognize that, at some point, most will choose to have families.
- **Review job and equipment design to reduce lifting requirement.** *It should be stressed that there is no question that current PI women are very able to perform the current duties of the job, including lifting.* However, the requirement to lift 20kilos/50lbs. appears to be an unnecessary barrier to women and persons with disabilities. It is only an occasional job requirement, and related to equipment design for sample cases, etc. The design for 50lbs in the grain industry is historical, and related to different jobs where maximizing handling throughput (e.g. bags of grain), was more of an issue.

## **Persons with Disabilities**

The CGC has adequate representation, but has recruited zero persons with disabilities over the three years examined by this report. The report recommends pro-actively offering accommodation of disabilities as a statement on job posters, and in the arrangements of testing and interviews. In addition, a more complete accommodation policy is recommended to fill in the implementation details delegated to departments by Treasury Board Policy. The new policy should also fill in gaps left by the current Return to Work Policy, such as accommodation of new employees with disabilities, and the accommodation of those with long-term disabilities. In terms of the latter, there is a particular challenge in accommodating GLGHW employees who have long-term disabilities. Investigation of cross-training to other occupations within CGC, or outplacement to other federal agencies, is recommended.

Also recommended is technical support for managers to assist them in assessing in accommodation requests; and a review of the accessibility of leased and owned premises consistent with the implementation of Treasury Board's revised policy on building accessibility for employees.

## **Aboriginal Peoples**

Aboriginal peoples are not directly addressed in this report, as current representation and recruitment are adequate. However, many of the recommendations for other designated groups will assist maintaining representation of Aboriginal employees. The full text of recommendations is provided in the final chapter of this report.

## **Communicating the Revised EE Plan**

As an important step in correcting some of the misunderstandings about employment equity, it is recommended that the revised Employment Equity plan resulting from this ESR be communicated to all employees in the form of a seminar covering the broader context of employment equity policy and the designated groups. It is further recommended that timing and planning of shifts permit all employees to attend.

It is expected that correcting the misunderstandings, particularly the relationship to merit and the reasons for it being a policy priority, will assist in the success of the proposed measures.



# 1 SUMMARY OF RECOMMENDATIONS

This chapter provides a list of the recommendations made.

## Chapter 3

*Potential Barrier: Limited advertising for PI-01 inventories restricts access to those not affiliated with the grain industry. The demographics of the grain industry are such that visible minority candidates are less likely to have such affiliations.*

**Recommendation #1:** The existence of the PI-01 inventory should be regularly advertised to the general public.

*Positive Measure: Monitoring candidate intake for designated group representation will help ensure that advertising has been successfully broadened. It will also help monitor for the presence of other employment barriers later in the recruiting process.*

**Recommendation #2:** Initiate a process for the regular recording and tracking of applicant self-identification.

**Recommendation #3:** Require applicants to the PI-01 inventories to fill out a Public Service application form, which includes a voluntary set of questions for self-identification as a member of a designated group.

**Recommendation #4:** At least once each year, Human Resources officers serving the CGC in each region should review designated group representation in applications to under-represented CGC occupational groups, and compare to representation among successfully appointed candidates. The object of the comparison will be to assess the success of obtaining a representative pool of applicants, and check the possibility of barriers further on in the hiring process.

*Positive Measure: Pro-active outreach and recruitment of designated group members will enlarge the designated group applicant pool in CGC competitions.*

**Recommendation #5:** In regions where representation of visible minority candidates is weak, broaden advertising techniques to specifically reach out to visible minority organizations and media. As a part of outreach, visible minority candidates could be targeted for student recruitment programs, for occupational groups and regions where under-representation exists.

**Recommendation #6:** The CGC should either

- (a) seek delegated authority from the PSC for direct appointment of employment equity designated group candidates to entry level positions in the regions and occupational groups where they are identified as under-represented by the Workforce Analysis; or
- (b) establish an arrangement with PSC offices to use the PSC's authorities.

*Positive Measure: Human resources planning can provide an important means for identifying future recruitment needs, permitting planning for improving designated groups representation.*

**Recommendation #7:** It is recommended that the CGC review its medium term requirements for renewal of its skilled workforce, and integrate efforts to improve representation with any resulting plan.

*Potential barrier: Dated aptitude tests are more likely to have avoidable cultural bias against members of visible minorities and aboriginal peoples.*

**Recommendation #8:** If the use of the PI aptitude test is continued, the CGC should request the Public Service Commission to:

- (a) Review and update the PI test to reduce the degree of cultural bias, and to more appropriately match sub-tests to required job skills.
- (b) Review the role and function of the vocabulary sub-test in particular
- (c) Provide multiple versions of the test to reduce the ability of candidates to pass on knowledge of the test to new candidates, and to permit candidates an opportunity to re-write the test at least once

**Recommendation #9:** As an interim measure, the CGC should not use the vocabulary sub-test in the PI Test.

**Recommendation #10:** When multiple versions of the exam become available, candidates should be offered the opportunity to re-write the exam at least once, replacing their old score with a new score.

*Positive Measure: Using industry knowledge tests as a pass/fail rather than as a weight in final ranking of candidates will reduce bias towards replicating the current demographics of the industry.*

**Recommendation #11:** Industry knowledge tests should be used only to screen candidates for basic ability to understand the industry, and should not be used in the ranking of qualifying entry-level PI candidates.

*Potential Barrier: Given the current lack of employee diversity within CGC, managers and other selection Board members may lack an ability to assess personal suitability on a cross-cultural basis.*

**Recommendation #12:** Personal suitability should be assessed in a structured and accountable way. Managers should receive refresher training in how this should be done as part of the broader training recommended further below (see recommendation #15).

**Recommendation #13:** Diversity management training focused on cross-cultural interview and selection techniques should be provided to all managers and human resources officers who participate in hiring CGC entry-level positions. The same training should be offered to members of the CGC employment equity advisory committees, to assist them in fulfilling their roles.

**Recommendation #14:** Standardization of the staffing methods and techniques across and within regions will help to ensure the transparency of competitive processes.

**Recommendation #15:** Retraining or a refresher course on staffing skills, taking diversity management into account, is necessary. This is particularly important given that managers have delegated authority for staffing.

***Positive Measure:** Formal policy on designated group representation on selection boards, together with ensuring gender balance, may help to eliminate barriers in the selection process, offset abuse of personal suitability and improve transparency.*

**Recommendation #16:** Require designated group representation on selection boards for open competitions in occupational groups where under-representation exists. When possible, the designated group board member should be drawn from the group(s) that are under-represented.

**Recommendation #17:** Until training issues are fully addressed, human resource officers should be included in selection boards for entry-level competitions in under-represented occupational categories.

***Possible Barrier:** Lack of a clear framework for maintaining and reviewing human resources policies may contribute to varying staffing processes between regions, and internally to regions.*

**Recommendation #18:** Establish a formal system for maintaining CGC human resources policies, and for communicating new policies both to human resources officers and managers. This may be as simple as maintaining an official binder of directives or, as is happening more frequently, maintaining an intranet site accessible to all employees.

***Positive Measure:** Providing feedback on selection process to unsuccessful candidates helps to build confidence in the selection system, and aids in the development of employees.*

**Recommendation #19:** In order to provide for greater transparency in the selection and hiring process, employees who desire more information on their performance should be offered the alternative option of a de-briefing following the expiry of the appeal period. Such de-briefings should be given to the employee by the hiring manager and the Human Resources advisor.

***Possible Barrier:** Lack of transparency and consistency in allocation of training.*

**Recommendation #20:** Establish a standard written description of expectations for PI-01 on-the-job training for the first two years, including time-lines. The description should provide expectations of PI-01's for training themselves, and the expectations that PI-01's may have of supervising PIs of types of assignments, job rotations, time spent with them, and performance feedback.

**Recommendation #21:** Survey new PI-01's (less than two years) annually on the fulfillment of the training expectations. Require Senior Managers to follow-up on any issues emerging from the survey.

**Recommendation #22:** As part of the implementation of more formalized PI training expectations, Senior managers in each CGC region should brief senior and mid-level PI's on the CGC's expectations for how renewal will take place over the coming years. This briefing should integrate communication of the need to meet the government's goal for *representativeness* of the qualified workforce, without compromising *quality*. Subsequent performance reviews should include contributions towards meeting these objectives.

**Recommendation #23:** If the CGC intends to continue using aptitude tests for weighers, it should ask the PSC to design one with the job skills of weighers in mind. In addition, recommendations #8, #9, #10, #11 on PI tests should also apply to weighers.

*Potential Barrier: As discussed under PIs, reliance on on-the-job training combined with undocumented training requirements is a disadvantage to visible minorities and other designated groups. Designated groups have poorer access to the informal connections that help secure such training and support.*

**Recommendation #24:** The CGC should complete its plans to formalize GLGHW training, and include a monitoring process. If it intends to continue using aptitude tests for weighers, the CGC should ask the PSC to design one with the job skills of weighers in mind. In addition, recommendations #8, #9, #10, #11 on PI tests should also apply to weighers.

*Positive Measure: The establishment of a graduate scholarship for visible minorities targeted towards encouraging research on CGC relevant topics will increase awareness of the CGC among university students, and help to train future visible minority applicants.*

**Recommendation #25:** Establish a CGC Scholarship for visible minority graduate students conducting thesis research towards the specific grain research needs of the CGC. Recipients should either be Canadian citizens, or have landed immigrant status and undertake to apply for Canadian citizenship when they become eligible. Complement with a summer employment program.

*Potential Barrier: Given the relationship between scientific and EG occupational groups, there exists the possibility that the lack of diversity in the CH and SERES occupations may be causing an unintended bias in the promotion of EGs. Without cross-cultural awareness, like will tend to hire like.*

**Recommendation #26:** Extend the previously recommended training on diversity management and interview technique to managers of EG employees.

**Recommendation #27:** Ensure a minimum budget and days set aside for professional development for each EG employee.

*Potential Barrier: The lack of understanding of employment equity principles, the relationship to fairness and merit, and its role in the responsibilities of government, result in misconceptions that disadvantage designated group employees, and hinder efforts to improve representation.*

**Recommendation #28:** A seminar on employment equity principles should be offered to all employees in conjunction with introducing the results of this ESR and the resulting Employment Equity Plan. The seminar should include providing appropriate expertise to answer employee questions on the broader concepts and implementation of the *Employment Equity Act*. Allowance should be made to allow all employees time to attend such a seminar. In particular the challenge of managing shifts to permit attendance by PIs and GLGHWs should be addressed.

**Recommendation #29:** Communication on the principles of employment equity should be re-emphasized with at least annual communication to all employees of progress in implementation of the employment equity plan.

*Positive Measure: Visible support of employment equity measures by senior managers and Commissioners.*

**Recommendation #30:** That the Chief Commissioner issue a supporting message to all employees when the next Employment Equity plan, incorporating recommendations accepted from this report, is published to employees.

*Positive Measure: Diversity management training is an important modern management skill that is best delivered in the context of over-all management and supervisory training. Ensuring that supervisors are fully trained in how to integrate diversity management into daily operations is a factor for the success of meeting employment equity objectives.*

**Recommendation #31:** Ensure that all supervisors and managers receive diversity management training. Where possible, this should be integrated with fulfilling the required MOP and SOP training.

**Recommendation #32:** Where such skills are not already present, managing diversity training should also be offered to human resources officers to ensure an available advisory resource to managers in each region.

*Potential Barrier: Lack of employee access to e-mail and the Internet is a barrier to communication of Employment Equity in the workforce.*

**Recommendation #33:** In order to make communication of Employment Equity to employees more accessible, the CGC should either make e-mail more accessible to employees, and provide the sufficient training, or consider other means of communication, including sending paper copies of Employment Equity communications to employees.

*Positive Measure: Including representativeness as a performance indicator for the human resources objectives of Management performance agreements, complemented with appropriate support to managers, is a positive measure for improving organizational performance on employment equity.*

**Recommendation #34:** Diversity management should be established as a competency for managers and be reflected within the evaluation of managers' performance assessments.

**Recommendation #35:** Performance on representativeness of the workforce should be included as a performance indicator in manager performance agreements. Indicators and goals should be tailored to correcting shortfalls in representation in relevant occupational groups or regions, as reported in the Workforce Analysis.

*Positive Measure: In addition to the general diversity management training recommended in Chapter Three, focused training on gender in the workplace will benefit managers and provide them with tools to influence change in their work environments.*

## Chapter 4

**Recommendation #36:** The recommended diversity management training for managers should include a gender in the workplace component. The gender component should be oriented on the private sector physical plant environment, as opposed to an office environment.

*Potential Barrier: The presence of pornographic or semi-pornographic pictures in terminal operations creates an uncomfortable environment for most women, and promotes an acceptance of a wider range of behaviors intolerant of women.*

**Recommendation #37:** The CGC should

- (a) adopt as a policy that the CGC finds posting of pornographic or semi-pornographic pictures in grain terminals a practice that is unsuitable for the dignity and professionalism of all its employees; and
- (b) actively request terminal operators to ensure that such postings are not present in any area where CGC employees might have to go either in the daily conduct of their duties, or in response to seasonal tasks or emergencies;
- (c) communicate to terminal operators the benefits of implementing such a policy to themselves under relevant provincial legislation and case law.

*Positive measure: Employees experience a more positive workplace if they have clear access to an independent means of identifying harassment incidents than they feel management supports.*

**Recommendation #38:** Provide each employee, annually for at least three years, a notice

- (a) re-stating the CGC's policy on harassment
- (b) defining, briefly, what harassment includes
- (c) providing current means of contact for reporting incidents of harassment (in addition and as an alternative to the employee's supervisor).

The notice should be on paper until such time as the e-mail access issues identified by this report are addressed

*Positive Practice: A family friendly policy of accommodating family needs of employees of both sexes (within the context of meeting operational requirements) removes the stigmatization of requesting accommodation of family needs. In addition to providing a reasonable framework to address shift allocation, removing the stigmatization increases the likelihood of attracting and retaining qualified women.*

**Recommendation #39:** Adopt an explicit policy, subject to operational requirements, of family-friendly shift and travel allocation for PIs and GLGHW's of either sex who have primary family care responsibilities and request such accommodation.

*Positive Practice: Eliminating unnecessary physical requirements of a job can remove barriers to some women, and to some persons with disabilities. Historical requirements that are currently unnecessary may constitute an unnecessary barrier to employment.*

**Recommendation #40:** Review the job design and equipment design of PIs to see if lifting requirements for all employees can be reduced by changes in procedures or equipment.

## Chapter 5

*Potential barrier: The absence of specific commitments offering accommodation to candidates in selection processes will often result in needed accommodation not being requested. This in turn will mean that the merit of the candidate with disabilities may not be fairly assessed.*

**Recommendation #41:** Include specific statements of the CGC's willingness to accommodate persons with disabilities, including the provision of competition materials in alternate formats, in advertising and posters for CGC positions.

**Recommendation #42:** Pro-actively ask candidates invited for testing or interviews whether they have any disabilities that would require accommodation.

*Potential Barrier: When employees and managers do not have guidelines on how to approach or fund accommodation of disabilities, there is a tendency for disabilities not to be recognized or accommodated.*

**Recommendation #43:** Establish a more general accommodation policy that places the Return to Work Policy in a broader framework. The policy should address accommodation in the selection process, accommodation of new employees, and accommodation of employees currently working who acquire disabilities. Processes left to department discretion in the TBS Accommodation policy should be addressed

*Positive measure: Managers will better appreciate the possibilities for job accommodation, if they know they have access to independent advice and guidance. They will also feel more comfortable and better disposed towards making the effort if they understand that it is a corporate objective that is reasonable, valuable and achievable.*

**Recommendation #44:** Include in the recommended accommodation policy a procedure where managers may solicit advice on accommodation through Human Resources. In turn, provide Human Resources officers with a list of advisory services both inside and outside the government, and ensure access to at least one Human Resources officer who has some training in job accommodation.

*Positive Measure: Find alternative employment for employees with long-term disability who can no longer perform their present jobs.*

**Recommendation #45:** Review the possibility of training GLGHWs with long term disabilities for other occupations within the CGC, or with other federal departments and agencies in each region.

*Potential Barrier: A lack of accessibility in the workplace can prevent some persons with disabilities from working for the CGC.*

**Recommendation #46**

Fulfil the undertaking made to the CHRC by completing a review of buildings owned or leased, and developing a plan for bringing them into compliance with TBS accessibility policy. In the case of leased premises, this may involve negotiations with landlords, either by the CGC or by its agent, the PWGSC.