College of Registered Psychotherapists of Ontario

# CRPO DEI FRAMEWORK

## March 2025

Developed by: CRPO Project Team

Facilitated by: Quansah Consulting, Decibel DEI Consulting (Consultants)

### Table of Contents


**GLOSSARY** ..... **2**

**INTRODUCTION** ..... **3**

PURPOSE ..... 7
METHODOLOGY ..... 7

**KEY STRUCTURAL ELEMENTS OF THE FRAMEWORK** ..... **8**

"ROOTS" ..... 8
GLOBAL DIVERSITY, EQUITY AND INCLUSION BENCHMARKS (GDEIB) ..... 9

**FRAMEWORK ROOTS** ..... **10**

1. ENGAGEMENT WITH SYSTEM PARTNERS ..... 10
2. DATA COLLECTION, ANALYSIS AND REPORTING ..... 12
3. POLICIES AND PROCEDURES ..... 16
4. LEADERSHIP, DIVERSITY AND ACCOUNTABILITY ..... 18
5. QUALITY ASSURANCE (QA) ..... 20
6. LEARNING ..... 22
7. CULTURAL SAFETY AND INCLUSION ..... 24

**INTERNAL RESOURCES** ..... **26**

**EXTERNAL RESOURCES** ..... **26**

**APPENDIX A** ..... **28**

**APPENDIX B** ..... **32**

# GLOSSARY

### Anti-Oppression
A practice of actively identifying and challenging structures, systems or behaviors that create unfair treatment or barriers for certain people or groups. It involves consciously working to remove these barriers, ensuring that all individuals—especially those historically excluded or marginalized—are treated fairly and have equitable opportunities to participate fully.

### DEI (Diversity, Equity and Inclusion)
A framework and set of principles aimed at ensuring fair treatment, representation and participation for all, especially historically marginalized groups.

### Cultural Safety
A regulatory approach that ensures policies, decisions and practices actively create environments where equity-deserving community members feel respected, included and free from harm. Cultural safety moves beyond awareness to accountability, requiring continuous reflection, meaningful engagement and structural change to address power imbalances and systemic barriers in regulatory processes.

### Cultural Sensitivity/Humility
An approach that values and respects differences in culture, and recognizes the importance of ongoing learning and self-reflection to avoid assumptions or stereotypes.

### Equity-Deserving Communities
Equity-deserving communities include groups that have historically experienced marginalization, systemic discrimination, and barriers within society. Specifically, but not exhaustively, CRPO acknowledges **First Nations, Inuit and Métis communities, Black communities (including African, African Canadian, Afro-Caribbean descent), Racialized groups, newcomers to Canada (immigrants, refugees) persons with disabilities (including members of the mental health community and neurodivergent persons), 2SLGBTQIA+ communities, older adults, gender diverse peoples and people in rural and near and far north areas of Ontario populations.** Each of these communities includes people with intersectional identities, reflecting complex experiences and barriers.

### Equity Impact Assessment (EIA)
A process for evaluating policies, practices or programs to determine their effects

on different groups, ensuring that equity is maintained or improved. Note: In this document, the proposed CRPO-specific EIA is intended to go beyond a simple checklist to deliver meaningful, actionable outcomes.

**System Partners**
External organizations, community groups, advocacy organizations and other stakeholders that collaborate with CRPO to enhance regulatory practices and DEI outcomes.

**Self-ID Data**
Data collected through voluntary self-identification (e.g., demographic information) to better understand the diversity of registrants, system partners or service users.

# INTRODUCTION

Emerging global factors are deeply shaping the context in which CRPO is integrating DEI into regulatory practices.

- The growing adoption of Artificial Intelligence (AI) in healthcare poses significant risks of perpetuating racial, gender, disability and other systemic biases, especially when these technologies are used uncritically within regulatory systems like registration assessments or quality assurance evaluations.

- Concurrently, there is a notable rise in anti-DEI sentiment, characterized by public skepticism, political pushback and resistance to equity-focused initiatives, increasing the need for regulators to articulate clear, evidence-based rationales for their equity commitments.

- Additionally, changing demographics and heightened public expectations around transparency and accountability mean regulators must consistently demonstrate concrete, measurable outcomes.

Despite these challenges, CRPO has positioned itself effectively to navigate this complex landscape, demonstrating tangible commitment to DEI as core regulatory priorities.

CRPO plays a critical role in supporting equity-deserving community members by ensuring fair, safe and accessible regulation of psychotherapy in Ontario. Through its mandate, CRPO helps create a profession that is accountable to the diverse

needs of the public by embedding cultural safety and anti-oppression principles into professional standards.

CRPO has taken steps to make registration more inclusive, such as exploring pathways for internationally trained practitioners and Indigenous healers. It also integrates equity-focused considerations into complaints, quality assurance and policy development processes to ensure fair treatment and reduce systemic barriers. By prioritizing transparency, ongoing DEI training and community engagement, CRPO works to build a regulatory environment where all registrants, particularly those from equity-deserving communities, can thrive.

Failing to embed DEI in regulation can lead to continued systemic inequities, reduced public trust and legal or reputational risks for regulators. More specifically, health regulators in Ontario can unintentionally create barriers for equity-deserving community members through rigid licensing processes, lack of accommodations and systemic biases in complaints and discipline. Internationally trained professionals often struggle with credential recognition, while exams and assessments may not be accessible for those with disabilities. Equity-deserving registrants, particularly Indigenous and Black professionals, may face disproportionate complaints or disciplinary actions due to systemic racism.

Fortunately, there is reliable guidance on DEI's role in organizational improvement. Research indicates that inclusive organizations are better equipped to innovate, manage risk and enhance overall performance (Shore, Cleveland & Sanchez, 2018)[1]. Deloitte's report *Waiter, is that inclusion in my soup? A new recipe to drive inclusion* (Deloitte, 2017)[2], underscores how embedding DEI into operational practices drives innovation, risk mitigation and improved performance.

Thus, integrating DEI into everyday operations is a strategic investment. It enhances safe, accessible psychotherapy services, upholds public trust and advances Objective 4—equity in regulatory practices. (CRPO, n.d.).

## Centering Equity-Deserving Communities in the Draft CRPO DEI Framework

This Draft CRPO DEI Framework (Framework) is anchored in CRPO's commitment to regulatory excellence, public safety and equitable access to psychotherapy services. Acknowledging that equity-deserving groups must be central to this

[1] Shore, L. M., Cleveland, J. N., & Sanchez, D. (2018). Inclusive workplaces: A review and model. *Human Resource Management Review, 28*(2), 176–189.
[2] Deloitte. (2017). *Waiter, is that inclusion in my soup? A new recipe to drive inclusion*. Retrieved from https://www.readkong.com/page/waiter-is-that-inclusion-in-my-soup-a-new-recipe-to-6679296

commitment is a first step towards eliminating systemic barriers and ensuring the equitable regulation of psychotherapy services.

For the purposes of setting the context for equity-deserving communities that are impacted by CRPO, the following is a **non-exhaustive** list of the communities that the Framework strives to include:

> **First Nations, Inuit and Métis communities, Black communities (including African, African Canadian, Afro-Caribbean descent), Racialized groups, newcomers to Canada (immigrants, refugees) persons with disabilities (including members of the mental health community and neurodivergent persons), 2SLGBTQIA+ communities, older adults, gender diverse peoples and people in rural and near and far north areas of Ontario populations.**

Individuals within these communities often have intersectional identities, meaning they belong to multiple marginalized groups simultaneously. Such intersectionality can compound systemic barriers, creating unique experiences and challenges that regulatory practices must explicitly acknowledge and address.

### Limitations: Engagement

This Framework, while comprehensive, was developed internally and primarily informed by CRPO Council, committees, working groups, staff and DEI experts—the very individuals who will utilize and operationalize it. As such, it reflects an institutional perspective that some may perceive as "ivory tower," disconnected from the lived realities and immediate needs of broader community members and grassroots organizations. Although thoughtful efforts have been made to incorporate equity principles and available stakeholder insights, the Framework currently lacks direct, extensive input from members of the broader community, particularly equity-deserving populations.

As outlined in the Engagement with System Partners section of this Framework, the 2026-2029 Strategic Plan must explicitly address this gap through meaningful communication, ensuring that community voices deeply inform and validate the direction and effectiveness of the framework.

### Limitations: Implementation

While this document strives to set out key themes and priorities that will drive successful implementation, it is not an implementation guide.  It is designed to acknowledge the inherent tension between planning and real-world

implementation. Even well-planned strategies may require adjustments when faced with practical challenges and unforeseen circumstances. For instance, if a planned initiative encounters resource constraints or unexpected regulatory changes, the Framework allows for recalibration because it does not set out a mandatory set of actions, but rather a cohesive source of guidance.

### Strategic Planning, 2026-2029

Council will be asked to integrate this DEI Framework throughout the 2026–2029 Strategic Plan, anticipating implementation challenges and opportunities. Rather than treating DEI as a separate silo or an add-on, it will serve as a foundational element that informs policy development, operational decision-making and organizational culture. In other words, it is important that the global strategic plan acknowledges DEI as a core value.

> *“Potential to be a leader in DEI”*
>
> *"[I am excited about] the ability to work in a comprehensive, integrated way, across the organization, on DEI."*
>
> *“Using data collection and reporting to drive changes in QA, policies and procedures can have a significant impact. Excited about what we will learn about our members.”*

To weave the Framework into the plan, planners might review each major goal or initiative and consider how DEI principles can support or enhance its outcomes. For example, when outlining program objectives, planners can ask whether these objectives consider the needs of all communities and promote fair access to services. Similarly, decisions on resource allocation and staffing can be examined through a DEI lens to ensure they support inclusivity. Including simple checkpoints or review questions in the planning process will help the strategic plan reflect DEI principles naturally, without overcomplicating the approach or the guiding document that results.

The process could involve cross-functional working groups (akin to the Project Team, i.e. teams composed of representatives from various departments) that embed DEI perspectives into each strategic priority, ensuring that initiatives related to engagement, data collection, policy reform, leadership development, quality assurance and continuous learning are woven into the fabric of the strategy.

This integrated approach emphasizes that DEI is not merely an isolated objective, but a central, transformative driver for the entire organization as CRPO advances its broader regulatory mandate.

## PURPOSE

The primary goal of this Framework is to:

1. Highlight key themes and priorities, or “Roots”.
2. Identify and articulate risks and opportunities that influence the framework's implementation.
3. Set a foundation for a comprehensive strategic planning process scheduled to begin in September 2025.

## METHODOLOGY

The development of this DEI Framework began in August 2024 and will continue through March 2025. An all-corners Project Team comprised of CRPO Council, committees, working groups, staff and DEI experts was established to:

1. Shape the Framework collaboratively.
2. Socialize the concept of a DEI strategy within the organization.
3. Build capacity and deepen team members’ understanding of DEI concepts and their application in health regulation.

The process included workshops, Project Team ideation and an iterative drafting exercise throughout January to March 2025 to finalize the Framework and the associated workbook (a compendium of relevant materials including slide decks, agendas and Project Team feedback via Mentimeter). This collaborative approach ensured that a diverse range of perspectives and expertise informed the Framework. To amplify the voices of Project Team members, commentary gathered from the Project Team during working meetings is highlighted in italics in text boxes throughout this document.

Moreover, the process has been designed to set the stage for the seamless integration of DEI principles, protocols and practices into all relevant elements of CRPO. The Project Team favors this integrative approach rather than isolating or “siloing” DEI initiatives as a separate addendum to the strategy.

This approach underscores the Project Team’s commitment to harmonizing DEI precepts into the mandate and behaviors of CRPO, thereby enhancing its effectiveness of services provided in Ontario by registered psychotherapists.

# KEY STRUCTURAL ELEMENTS OF THE FRAMEWORK

## "ROOTS"

Themes, trends, priorities, pillars and similar terms denote foundational perspectives in strategic planning exercises. However, terms such as "pillars" carry colonial connotations.

For the purposes of the CRPO DEI Framework, it is proposed that the term "Roots" be used to frame thinking around a comprehensive, integrative approach that is built upon a strong, deep and interconnected system.

The Roots of the Framework represent the foundational elements that nourish equity, inclusion and justice throughout the organization. They sustain growth, connect all parts of the system and foster inclusive behaviors that are sustainable over time.

For example, consider how data collection and reporting support policy development. Reliable data gathered from registrants can reveal patterns of inequity, such as highlighting delays in service or unequal treatment, that then prompt a review of current policies or the development of new policies. This same data can guide the creation of learning modules for quality assurance, ensuring that assessments are sensitive to the diverse needs of clients in Ontario.

In another instance, engaging with system partners—such as community organizations and advocacy groups—can highlight areas where the organization may be unintentionally excluding certain voices. These insights lead to adjustments in leadership practices and resource allocation, further strengthening the overall system.

Like the intertwined roots of a strong tree, each element of this Framework supports the others to cultivate a resilient, inclusive culture.

*"This will be an integrated 'rooted' framework that will guide all our work."*

*"Clear delineation of each of the different roots helps break up the work into smaller, more actionable pieces."*

## Global Diversity, Equity and Inclusion Benchmarks (GDEIB)

The GDEIB provide a comprehensive Framework for organizations to assess and advance DEI efforts through 15 categories organized into four key levels: Foundation, Exploration, Integration and Sustainable Transformation. The Roots in this Framework align with and fulfill GDEIB's foundational principles by embedding systemic, sustainable DEI practices into the organization's culture, operations and decision-making processes.

Each Root—such as engagement with system partners, data collection accountability structures and capacity-building—addresses the GDEIB's emphasis on collaboration, measurement, transparency and leadership accountability. For example, the data collection and reporting Root reflects GDEIB's priority of utilizing evidence-based insights to drive decision-making and track progress, while engagement with system partners demonstrates alignment with GDEIB's focus on stakeholder collaboration to foster shared ownership of DEI initiatives.

By grounding DEI work in interconnected and sustainable roots, this Framework not only meets but anticipates GDEIB's benchmarks for long-term, transformative impact.

# FRAMEWORK ROOTS

## 1. ENGAGEMENT WITH SYSTEM PARTNERS

Rationale

Building meaningful relationships with system partners is integral to advancing DEI within CRPO's regulatory framework. Simply put, strong engagement amplifies the voices of equity-deserving communities. By actively seeking input through both formal consultations and informal dialogues, engagement is designed to ensure that these perspectives are authentically represented in CRPO's processes.

*"Meaningful engagement so we are not perpetuating power imbalances or existing systemic challenges through our outreach."*

*"Important to call out the risk of loss of trust. I think it's implicit in the document but should consider calling out."*

*Are there organizations that we don't have relationships with yet, who would be key for this type of work?*

*"Communicating with all parties is key to meaningful outcomes"*

*"[Collecting data from engagements] will be the benchmark to evaluate CRPO initiatives and build strategies based on the findings."*

*"[The goal of collecting engagement data is] to understand how to weigh feedback - listening to equity-deserving communities is paramount in our work."*

Current Initiatives include:

1. DEIWG and IDEA Group – Active collaboration on DEI initiatives.
2. CNAR Circle – Participatory discussions aligning DEI strategies with broader regulatory contexts.
3. Indigenous Pathway Development – Ongoing engagement with Indigenous thought leaders.
4. Two Staff Roundtables held in 2023/24, which sought feedback on a broad scope of DEI related matters.
5. CRPO Organizational Complaints and Feedback via "Contact Us".
6. A robust complaint and discipline process related to RPs.
7. DEI Webpage Development – The webpage will:

a. Showcase the DEI Statement prominently.
b. Provide transparency and updates on DEI initiatives.
c. Serve as a platform for accountability in ongoing DEI work.

Opportunities for Enhancement include:

1. Engagement Criteria

    - Finalize and implement a system partner engagement criteria set that emphasizes equity, relevance and representation. See draft engagement criteria at **APPENDIX A.**

2. Engagement Inventory

    - Compile a detailed inventory of current and past engagement initiatives to identify gaps and opportunities. See **APPENDIX B** for the November 2024 inventory of activities.
    - Map system partners – including underserved communities – to ensure comprehensive representation.

3. Ongoing Consultation

    - Set up reliable methods for regularly collecting feedback from registrants and communities so that their voices help shape ongoing improvements, for example, through annual or bi-annual focus groups or quarterly surveys.

Risk Analysis:

1. Low Risk – Missed opportunities to engage key system partner groups.
2. Medium Risk – Limited participation from equity-deserving groups; over-reliance on certain partners may skew feedback or overlook critical voices.
3. High Risk – Lack of actionable outcomes from engagement activities. Risk of creating barriers to trust due to inappropriate, extractive and unaccountable engagement practices.

    Risk Mitigation Strategy: Diversify system partner engagement by incorporating multiple input avenues (digital and in-person) and clearly outline how data will be used to improve services. For example, CRPO could hold bi-yearly roundtable discussions with community partners alongside a quarterly online survey. The combined feedback would then be reviewed and

shared in an annual report that explains how it was used to adjust services—such as refining registration processes or updating learning modules—to better meet community needs.

Next Steps:

1. **Actionable:** Implement and pilot the system partner engagement criteria set.
2. **Longer-Term:** Adjust engagement frequency to align with organizational capacity – for instance, quarterly engagements for targeted system partner groups.
3. **Aspirational:** Establish a permanent DEI advisory committee with diverse representation to guide ongoing system partner engagement.

## 2. DATA COLLECTION, ANALYSIS AND REPORTING

Rationale

Comprehensive data collection identifies systemic disparities, informs evidence-based policy-making and supports equitable outcomes. Thus, reliable and comprehensive data collection is key to understanding the diverse needs of CRPO's registrants, system partners and the communities they serve.

*"Include self id data collection across all process functions"*

*"Consider how analyzed data will drive improvement and avoid echo chambers"*

*"How we use the analyzed data is going to be the true challenge."*

*"Clear delineation on how data will be used to drive policy development and improvements, ensuring that the plan for data analysis is transparent and actionable."*

*"Are we or should we ask for relevant data from system partners?"*

Expanding data sources to include self-identification data across all process functions ensures deeper insights into demographics, systemic barriers and areas for improvement, for example, identifying where bottlenecks exist in the registration process.

Improved reporting mechanisms and self-identification data will enhance

transparency. This integration will help monitor progress and drive equity-focused strategies with measurable outcomes.

To complement quantitative approaches, qualitative data collection must also be integrated consistently. Methods such as interviews, focus groups, narrative feedback and storytelling provide valuable insights into lived experiences, systemic biases and community perspectives that quantitative data alone may not reveal. Regularly combining qualitative insights with quantitative findings will create a more holistic, nuanced understanding of barriers, informing CRPO's strategies and policies more effectively.

Current Initiatives include:

1. Self-ID data collection is in development.
2. Demographic data used for DEI analysis.
3. Other datasets include age, education and geographic location.

Opportunities for Enhancement include:

**1.** Expanded Data Sources

- Include outcomes from complaints, registration timelines and QA results in DEI analytics.

  Example: If data shows that certain applicant groups experience longer registration processing times, this may signal systemic issues needing policy review.

2. Qualitative Data Collection

- Integrate qualitative approaches into existing data processes to capture deeper insights into registrant experiences and systemic barriers.

  Example: Supplementing registration timeline data with narrative feedback from registrants can uncover underlying causes of delays, such as systemic bias or barriers not evident from numbers alone.

  Example: Periodic focus groups or listening circles with equity-deserving registrants can provide critical insights into the effectiveness and accessibility of CRPO's complaint and QA processes, highlighting potential areas for improvement.

3. Data Analysis and Tracking Trends

    - Track trends across functions using consistent data sets to identify areas for process improvement of CRPO's processes.

      Example: By comparing registration data with the results of quality assurance evaluations and follow-up learning records, CRPO can determine whether improvements in one area (like streamlined registration) are leading to better performance in QA scores or reduced complaint rates.

    - In addition, it will be critical to ensure that CRPO staff members are able to analyze data by building capacity through targeted learning programs, adopting effective analytical tools and establishing clear protocols for interpreting and reporting data insights.

      Example: Imagine that aggregated data from self-identification surveys shows that, on average, registrants who identify as having a disability receive lower quality assurance scores compared to those who do not. Without linking data to individual registrants, CRPO staff can use this overall trend to examine whether certain parts of the evaluation process are consistently underperforming for registrants with disabilities.

      With proper learning in data analysis, staff could then identify which components of the assessments might need to be adjusted—such as by improving accessibility in test formats or offering additional support during evaluations. This approach allows CRPO to use aggregated data to make targeted improvements that ensure fair and inclusive treatment for all registrants.

4. Barriers Identification

    - Conduct regular surveys with registrants to identify systemic barriers.

      Example: A quarterly (or other reasonable schedule) online survey could ask registrants about challenges they face during the registration process or in accessing resources, which provides actionable insights that help identify and address persistent obstacles.

Risk Analysis:

1. Low Risk – Inconsistent data collection practices or low participation in self-ID surveys may result in incomplete datasets.
2. Medium Risk – Resistance to cultural change from system partners.
3. High Risk – A lack of measurable outcomes may undermine DEI credibility.

   Risk Mitigation Strategy: Strive to guarantee confidentiality and disclose how data will be used, provide appropriate incentives for participation and clearly communicate how data will drive improvements and build resources for registrants.

   In other words, CRPO could ensure all survey responses are anonymous to protect individual privacy. In addition, to encourage meaningful participation from Indigenous communities and other historically marginalized groups, CRPO will consider offering culturally appropriate compensation.

   This could include honoraria for Indigenous participants and similar supports (such as covering transportation or other expenses) for other community members, acknowledging the time and expertise they contribute. Then, CRPO could share an annual report that clearly explains how the survey data was used to make specific improvements, such as streamlining the registration process or enhancing support resources for registrants. This approach builds trust and shows that the data directly contributes to better services.

Next Steps:

1. **Actionable:** Dedicate resources to data analysis learning to broaden data collection, safety and use practices. Consider integrating findings into an annual DEI report or into regular reporting already in place.
2. **Longer-Term:** Use collected data to identify systemic barriers and make actionable recommendations for change.
3. **Aspirational:** Implement a system to track DEI metrics and adjust organizational policies as needed.

## 3. POLICIES AND PROCEDURES

Rationale

Integrating DEI principles—including trauma informed approaches, anti-racism and anti-oppression—into policies proactively dismantles systemic barriers, ensuring fair, transparent and inclusive regulatory processes. Thus, embedding DEI into CRPO's policies and procedures is vital for driving systemic change and promoting core values of fairness and safety.

*"Policy development work well underway…keep up the good work"*

*"Ensure that the language clarifies that Equity Impact Assessments rely on robust data collection and that case studies are used to address systemic bias."*

*"While we face challenges to increase diversity because of government constraints, our rooted framework, education with existing board members and advocacy is key."*

Current Initiatives include:

Policy Review

1. The establishment and ongoing support of the DEI Working Group (now in its 3rd term/year), providing advice on policy development to Council.
2. Ongoing review of policies through a DEI lens, guided by the RHPA-mandated HPRO EIA tool.
3. Commitment to updating standards to reflect DEI principles, including accessibility and anti-oppression.

Trauma-Informed Regulation

1. Implementation of recommendations from the Barbara Schlifer Clinic Report to embed trauma awareness into regulatory practices.

Accessibility

1. A comprehensive AODA Website Review with implementation of findings underway.
2. An Accessibility Policy outlining CRPO's approach to reducing barriers for individuals with disabilities.

Opportunities for Enhancement include:

1. CRPO-Specific EIA

    - Replace reliance on the general HPRO EIA tool with a CRPO-specific Equity Impact Assessment process that emphasizes meaningful outcomes over a checkbox exercise.

2. Systemic Barriers

    - Develop clear case studies and guidance documents that address systemic bias, particularly in registration and complaint processes.

| *"Clarify the use and purpose of case studies and ensure they are actionable."* |
|---|

Risk Analysis:

1. Low Risk – Adjustments to the accessibility policy may take time but will not significantly disrupt day-to-day operations.
2. Medium Risk – Relying on a general EIA tool may lead to an insufficient assessment of CRPO-specific barriers.
3. High Risk – Failure to address systemic bias or align policies with DEI principles could perpetuate inequities.

    Mitigation Strategy: Continue to review existing policies and protocols; continue to incorporate advice and guidance provided by DEIWG early in the policy review and development process to ensure policies address real-world barriers.

Next Steps:

1. **Actionable:** Finalize and integrate a CRPO-specific Equity Impact Assessment process, informed by consultation and piloting with registrants and system partners.
2. **Longer-Term:** Review and enhance the accessibility policy to ensure comprehensive coverage of physical, procedural and technological barriers.
3. **Aspirational:** Seamlessly integrate a DEI policy framework into future policy-related strategic planning that influences all major decisions and underscores CRPO's commitment to inclusive and equitable practices.

# 4. LEADERSHIP, DIVERSITY AND ACCOUNTABILITY

*“Revisit Council recruitment and retention strategies”*

*“Do [people from equity-deserving communities] believe in the college enough to seek appointments? Or do they feel alienated and would not want to participate?”*

*"Consider distinguishing between Council and committee composition, address electoral structure challenges, and provide guidance on engaging with key government stakeholders."*

*“How do you determine which groups to engage? Is the goal to increase diversity to reflect client population, registrant population, or something else?”*

*“If challenging to increase governance diversity due to elections, should there be more of a commitment to distinguish Council vs. committee composition to foster more diversity at the decision-making level.”*

*“Concern about ability to work to diversify public appointees”*

*“Gov controls some appointments - how do we manage?”*

Rationale

Inclusive leadership and diversity in governance are essential to advancing CRPO’s vision for equity and representation. Enhancing Council and committee diversity and equipping leaders with the tools to embed DEI into decision-making processes strengthens accountability and aligns with organizational values.

Opportunities for Enhancement:

1. Council and Committee Diversity

    - Establish targeted recruitment efforts to increase Council and committee diversity, particularly for equity-deserving groups, while encouraging candidates who possess strong governance, regulatory and policy expertise to participate.

      It is recommended to develop separate strategies for Council and committee composition, especially where election processes may limit diversity. Consider government relations and advocacy potential

opportunities to advance diversity and demonstrate accountability to the goal of diverse representation.

- Enhance learning/onboarding (consider a mentorship pipeline) to prepare diverse staff and external candidates for future governance roles.

2. Leadership Knowledge

    - Enhance executive and leadership understanding of DEI in regulatory contexts by offering advanced, governance-focused DEI workshops and learning modules**.**

    - Consider accessing DEI modules tailored to governance decision-making, potentially drawing from The Council on Licensure, Enforcement and Regulation (CLEAR) guidance on cultural sensitivity and humility in regulation.

3. Long-Term Advisory Structure

    Develop a sustainable, inclusive advisory framework that integrates ongoing input from Council, executive staff, committee members, registrants and public members. Over time, this structure could evolve into a standing collaborative body—similar in composition to the current Project Team—tasked with providing strategic DEI guidance. This body would actively seek insights from diverse communities and subject matter experts, reinforcing collective responsibility for equity and inclusion across all levels of CRPO governance.

    - Consider providing transparency to new and existing members regarding Council and committee functions, including the creation of a simple, clear video explaining Council and committee roles, processes and potential barriers. This video could also be provided to RPs and the public to improve understanding and trust.

Next Steps:

1. **Actionable:** Conduct a Council, committee and staff diversity audit to establish baseline metrics that will guide recruitment strategies.
   a. Ensure that Council and committee members reflect the diversity of the regions they serve, including considerations for public appointments.
   b. Evaluate structural factors (such as term limits) that may affect diversity.

2. **Longer-Term:** Design and deliver DEI governance workshops tailored for Council and committee members.
3. **Aspirational:** Create a long-term succession and mentorship plan that fosters diverse leadership.

## 5. QUALITY ASSURANCE (QA)

Rationale

DEI-focused QA processes ensure culturally safe, equitable service delivery, promoting public trust and high-quality psychotherapy practice. For CRPO, DEI is a vital component of QA processes that support registrants in meeting the needs of diverse communities. Enhancing professional standards through DEI-focused learning, case-based assessments and robust feedback mechanisms promote fairness and responsiveness.

*"Clarify scenario-based assessments, ensure the feedback loop is accessible to all while managing volume"*

*"Add more situational judgement/case study resources into standards for clarity and to assist people who learn differently"*

*"Existing continuous learning framework is critical for advancing and facilitating DEI learning"*

Current Initiatives include:

1. A QA program that ensures registrants demonstrate ongoing competency.
2. Standards that address cultural humility/sensitivity in key areas.

Opportunities for Enhancement include:

1. Enhanced Learning

    - Include DEI-specific learning modules (for example, addressing bias in clinical practice) in QA tools.

    - Provide learning on implicit bias, cultural humility and equitable evaluation techniques for QA assessors and reviewers.

2. Case-Based Assessment (CBA)

- Incorporate case-based assessments in QA peer and practice reviews to evaluate registrants' approaches to serving equity-deserving clients.

*"The CBA (case-based assessment) to include equity-focused cases. Presumably, some will also appear in the practice questions."*

*"Ensure that the feedback loop captures diverse perspectives and remains actionable."*

3. Metrics and Feedback

    - Develop structured feedback loops for staff, practice advisors, peer coaches and registrants in order to ensure inclusivity and manageable data collection without becoming an echo chamber.

Risk Analysis:

1. Low Risk – Delays in developing DEI learning modules may not severely disrupt short-term QA operations.
2. Medium Risk – Without DEI Standards there are no objective measures to develop CBA cases that address subtle biases in registrant practices.
3. High Risk – Failure to integrate DEI principles in QA could perpetuate practices harmful to equity-deserving clients.

    Mitigation Strategies: Broaden QA learning to encompass intersectional DEI considerations (including ableism) and regularly review assessment tools. If QA reviews reveal consistent gaps in cultural sensitivity, targeted learning can be implemented.

Next Steps:

1. **Actionable:** Design and implement DEI learning specifically for QA Practice Advisors, Peer Coaches and staff.
2. **Longer-Term:** Integrate CBA cases that address equity challenges in practice.
3. **Aspirational:** Develop a comprehensive DEI framework for registrants to be embedded into QA standards.

## 6. LEARNING

Rationale

Fostering a culture of continuous learning is essential for embedding DEI into CRPO's practices. CRPO is committed to developing comprehensive learning initiatives that address DEI topics relevant to the regulation of psychotherapists and enhance organizational understanding.

Current Initiatives include:

1. DEI learning provided to staff, registrants (RPs) and Council members.

Completed Learning (staff and Council) includes:

1. Decibel DEI Consulting Workshops such as:
   Unconscious Bias and Microaggressions Workshop (June 23, 2022)
   Setting Foundations of DEI (June 21, 2023)
   Critical Reflections for Staff (focused on supporting disabilities through DEI-approved practices, 2024)
   Practicing Inclusion (August 8, 2024)
2. Other Workshops: Accommodations Learning (September 13, 2023)

Opportunities for Enhancement include:

1. Tailored advanced learning for distinct groups:
   - Staff – Advanced anti-oppression and service delivery workshops.
     Leadership – Governance-specific DEI learning aligned with regulatory decision-making.
     Registrants (RPs) – Practical modules on inclusive care for equity-deserving populations.

| |
|---|
| *"Role specific DEI learning is a great idea e.g. leadership, committee specific, etc."* |

2. Consider a subscription service for tailored, on-demand learning

3. Determine the effectiveness of learning by measuring learning outcomes explicitly. To gauge whether participants truly understand and apply DEI concepts, it is essential to measure learning outcomes through structured evaluation methods (e.g., pre- and post-training assessments, reflective practice exercises, case-study discussions). Effective measurement ensures accountability and promotes meaningful improvements (e.g., increased

cultural humility, reduced bias in decision-making, enhanced equity in service delivery).

Risk Analysis:

1. Low Risk – Duplication of existing learning resources.
2. Medium Risk – Overlooking opportunities for public-facing learning.
3. High Risk – Insufficient alignment of DEI learning with CRPO's core mandate.

   Mitigation Strategy: Utilize differentiated approaches that ensure relevance for each role and provide participation incentives. This means that different groups—whether they are staff, Council members or community representatives—might need their own unique ways to be involved and feel that their input matters. It also suggests that there should be some form of participation supports or acknowledgment (such as honoraria or support with expenses) to encourage everyone to participate actively.

Next Steps:

1. **Actionable:** Develop role-specific DEI learning opportunities tailored to CRPO staff, RPs, leadership and Council members.
2. **Longer-Term:** Expand DEI professional development into a formalized career development program for all staff.
3. **Aspirational:** Integrate DEI professional development into CRPO's long-term learning and certification framework for registrants.

## 7. CULTURAL SAFETY AND INCLUSION

Rationale

Achieving meaningful cultural safety requires aligning organizational values, professional standards and strategic goals. This alignment ensures that registrants are equipped to provide equitable care, while CRPO fosters a sense of belonging among staff, Council and equity-deserving communities.

*"Consider including committee members and explicitly address transparency, sharing of knowledge, Council buy-in, and capacity-building for when this lands on people's desk."*

*"Think about meaningful metrics to ensure changes we make are actually working"*

*"Shift from cultural competency to cultural sensitivity/humility"*

*Challenge: "Most challenging is trying to enact change within structures and frameworks that are built on colonial frameworks"*

*Opportunity: "Bringing about change that has a population level impact (the public)"*

Current Initiatives include:

1. Organizational values that affirm commitments to inclusivity and cultural sensitivity/humility.
2. Professional standards that reflect cultural sensitivity/humility expectations for registrants.
3. The IDEA Committee – a staff group examining inclusive approaches and exploring strategies to enhance belonging.

Opportunities for Enhancement include:

1. Develop and communicate specific inclusion strategies for registrants, staff, Council members and committee members that address transparency, knowledge sharing, Council buy-in and capacity-building.

   For example, periodic briefings and learning sessions can be held to ensure that all levels of the organization understand and can implement these inclusion strategies.

Next Steps:

1. **Actionable:** Conduct climate surveys among registrants and staff to evaluate inclusion and belonging.
2. **Longer-Term:** Integrate DEI principles, practices and protocols into the 2026–2029 Strategic Plan, aligning DEI goals with the organization's long-term vision.
3. **Aspirational:** Expand this integrated DEI approach into the 2030–2033 Strategic Plan to promote ongoing, organization-wide inclusion.

# INTERNAL RESOURCES

- About Us
  https://crpo.ca/about-us/who-we-are/

- DEI Homepage
  https://crpo.ca/about-us/diversity-equity-and-inclusion/

- Accessibility
  https://crpo.ca/about-us/accessibility/

- Regulatory Objectives

  https://crpo.ca/wp-content/uploads/2024/09/Regulatory-Objectives-2023-2026.pdf

# EXTERNAL RESOURCES

1. Global Diversity, Equity & Inclusion Benchmarks (GDEIB)
   Link: https://dileaders.com/gdeib/

   Description: A comprehensive guide for assessing and improving DEI practices across organizations, providing actionable benchmarks for aligning DEI efforts with strategic goals.

2. Ontario Health's "Equity, Inclusion, Diversity, and Anti-Racism Framework"
   Link: https://www.ontariohealth.ca/system/equity/framework

   Description: A framework for embedding equity, inclusion, diversity, and anti-racism into systems and regulatory practices.

3. **Canadian Centre for Diversity and Inclusion (CCDI)**
   Link: https://www.ccdi.ca/

   Description: Provides research, tools, and best practices for promoting diversity and inclusion in the workplace, tailored to Canadian organizations and regulators.

4. **Diversity and inclusion in the Public Service**

Link: https://www.canada.ca/en/government/publicservice/wellness-inclusion-diversity-public-service/diversity-inclusion-public-service.html

Description: This resource page outlines the Government of Canada's commitment to building a diverse, inclusive and equitable public service through strategic initiatives, policies and practices that enhance representation and foster a supportive workplace environment.

# APPENDIX A

## Briefing Note for CRPO DEI Framework

| | |
|---|---|
| **Meeting Date:** | December 9, 2024 |
| **Agenda Item #** | |
| **Issue:** | **Establishing Criteria for CRPO-Led Engagement with Equity-Deserving Communities** |
| **Attachment(s):** | |
| **References:** | *included in briefing note |
| **Action:** | Information [x] Discussion [x] Decision [x] |
| **Staff Contact:** | D. Adams, A. Fournier |

### Purpose

This report outlines proposed criteria for the engagement phase of the 2026–2029 College of Registered Psychotherapists of Ontario (CRPO) strategy. It is intended to provide an evergreen framework to guide thoughtful, equitable, and impactful engagement practices. By developing these criteria, CRPO can support engagement with equity-deserving system partners in a manner that is consistent with principles of equity, inclusion, and right-touch regulation.

### Overview

Effective engagement with equity-deserving communities is essential to the success of the 2026–2029 CRPO strategy. The engagement process must reflect CRPO's commitment to fostering a regulatory environment that is inclusive, trauma-informed, culturally safe and responsive to diverse needs. Establishing clear criteria also ensures that engagements are aligned with CRPO's mandate to protect the public interest while minimizing harm and burden on communities.

Without a robust framework, engagements can run the risk of becoming extractive, disproportionate, or misaligned with the needs and priorities of system partners and CRPO. Establishing criteria helps to clarify why, who, and how to engage, while maintaining flexibility to adapt to emerging trends and opportunities.

### Draft Criteria for Engagement

To promote meaningful, safe, and equitable engagement with equity-deserving system partners, the following criteria are being put forward to the Project Team for their consideration:

1. **Relevance**: System partners engaged must be directly impacted by psychotherapy services, including but not necessarily limited to:

    - Members of the public, particularly equity-deserving groups who interact with or are affected by regulatory decisions.
    - CRPO Council, staff, and registered psychotherapists (RPs).
    - Allied regulators, healthcare organizations, etc.

2. **Equity Focus**: Groups engaged must include members of equity-deserving communities, ensuring that diverse perspectives inform decision-making processes.

3. **Safety**: Engagement processes must

    - Avoid causing harm by taking trauma-informed and culturally safe approaches.
    - Be non-extractive, seeking only necessary information.
    - Respect the time, energy, and emotional labor of participants.

4. **Proportionality**: Engagement must be proportional to the regulatory need, reflecting a right-touch regulatory approach.

    - Simply put, do not ask for information that is not needed.
    - Defining the purpose of the engagement will dictate what information is needed.
    - Example: It is not necessarily proportional or relevant to ask RP candidates to identify their religious affiliations when engaging them about barriers that have arisen in the licensing process due to their disability status.

5. **Reciprocity**: Wherever possible, engagements must provide value to the community, whether through trust building, shared findings, capacity-building, or other tangible benefits.

## Core Principles

For the information of the Project Team, the criteria above reflect core principles of equity, proportionality, and harm reduction. Several key considerations arise from these criteria:

- **Clarity of Purpose**: Before initiating engagement, CRPO must clearly define its purpose and identify how the engagement will inform regulatory practices. Engaging without a clear objective runs the risk of wasting resources and creating disengagement or harm.

- **Balancing Diversity and Expertise**: While it is critical to prioritize equity-deserving groups, CRPO must also ensure that voices from across the regulatory spectrum—Council, RPs, and system partners—are included.

- **Harm Mitigation**: Trauma-informed and culturally safe approaches are not only ethical imperatives but also ensure that engagement does not retraumatize or alienate participants. This requires learning and preparation for those leading engagements.

- **Evergreen Criteria**: The proposed framework is intentionally broad, allowing it to adapt to evolving needs. However, applying the criteria consistently will be key to its success.

- **Reciprocity and Right-Touch Regulation**: By integrating reciprocity into engagements, CRPO can build trust with communities, ensuring they see value in participating. A right-touch approach ensures that CRPO engages only to the extent necessary, respecting the time and capacity of participants.

## Discussion Questions for Decision

- Are there any criteria that are missing or need to be removed/adjusted?

- Are there any perspectives, voices, or considerations that these criteria might overlook?

- Can we reach agreement on the criteria? These criteria will be used by staff who will undertake the engagements throughout the 2026-2029 strategic development work being initiated in 2025.

## Additional Resources

- *Equity in Engagement Framework*, Ontario Health. Link

- *Supporting equity-centered engagement: A step-by-step guide with tailored resources*, Public and Patient Engagement Collaborative, Public Engagement in Health Policy, McMaster University. 2023. Link

# APPENDIX B

## CRPO DEI AUDIT (NOVEMBER 2024)

| Domain | Resources | Status |
|---|---|---|
| Policies and Procedures | Policy Review Cycle<br>• Outlines requirements and considerations for reviewing CRPO policies<br>  ○ Requires consideration of whether policy language is current<br>  ○ Requires consideration of whether any group would be negatively impacted by the policy<br>  ○ Requires consideration of whether there may be multiple interpretations of the policy | Completed, posted online |
| | Accessibility statement/standards<br>• Outlines CRPO's commitment to accessibility of all materials and commitment to serving individuals with disabilities through learning, communication methods, and universal design | Completed, posted online |
| | Religious Holiday Substitutions<br>• Policy allows employees to substitute statutory religious holidays in favour of other religious holidays<br>• The statutory holidays available for substitution include Good Friday (Mar 29), Easter Monday (Apr 1), Christmas Day (Dec 25), and Boxing Day (Dec 26). Staff may select up to 4 of these dates to substitute for alternative religious observances. | Internal document, available in CRPO handbook |
| | Accommodations Policy<br>• Seeks to specifically outline available accommodations for all CRPO regulatory functions (registration, QA, complaints/reports process), as well as aspects of universal design where accommodations are not necessary | In development |
| | Registration Requirements | |

| | | |
|---|---|---|
| | • CRPO's competence-based registration practices provides mechanism for applicants to meet requirements<br>  ○ with education from outside Canada<br>  ○ without having Canadian clinical experience<br>  ○ through a flexible approach to language proficiency demonstration. | |
| | Cultural Humility and Non-Discrimination Standard<br>• Broad standard that seeks to provide protections to all clients<br>• Will include a link to a "key resources" page where CRPO can link to relevant documents for registrant education<br>• Distributed for consultation with pan-Canadian regulators and associations | In development |
| | Indigenous Cultural Humility and Non-Discrimination Standard<br>• Targeted standard that seeks to provide specific protections to Indigenous clients within the contexts of historic and ongoing colonization<br>• Will include a link to a "key resources" page where CRPO can link to relevant documents for registrant education<br>• Distributed for consultation with pan-Canadian regulators and associations | In development |
| | Committee Composition Matrix<br>• Directs the requirements for lived-experience required on committees to ensure needed diversity of perspective | Completed, available online |

| Domain | Resources | Status |
|---|---|---|
| Training and Development | CRPO staff training<br>• AODA training upon hiring; enhanced AODA training for key staff in each department ("accessibility hub" created) | Ongoing |

| | | |
|---|---|---|
| | • Integrated Accessibility Standards Regulation training<br>• CCDI employer partner<br>  ○ X2 training sessions and ongoing access to resource library<br>• University of Alberta MOOC Indigenous Canada Course and staff study group | |
| | Council training<br>• Trauma informed practice day presentations<br>  ○ Intergenerational Indigenous trauma, Trauma associated with anti-Black racism<br>• CCDI employer partner<br>  ○ X2 training sessions<br>• Unconscious Bias (presented by Darcy Belisle)<br>• Having Difficult Conversations (presented by Elder Cat Criger)<br>• Developing a land acknowledgement | Ongoing |
| | Committee training<br>• Registration Committee: Indigenous Listening Circles (presented by Elder Cat Criger) | |

| Domain | Resources | Status |
|---|---|---|
| HR and Workforce Data | Exit interviews conducted with departing staff<br>• An opportunity to identify any DEI-related concerns in the workplace | Ongoing |
| | Registrant Self-ID Data<br>• Voluntary provision of self-identification data by registrants and applicants to support meaningful equity impact assessments | In progress |

| Domain | Resources | Status |
|---|---|---|
| | IDEA Committee operating | Ongoing |

| | | |
|---|---|---|
| Internal DEI Committees or Working Groups | • CRPO's internal DEI working group striving to support a workplace rooted in the principles of diversity, equity, and inclusion, aligned with CRPO's mandate of serving the public interest and ongoing institutional efforts to enhance respect, community and belonging | |
| | DEI WG<br>• Registrant working group providing advice to Council and committees on matters that related to DEI affecting client members of the public, RPs and related practices, policies and procedures and programs. | Ongoing |
| | DEI Strategy Task Force<br>• Council and staff group fostering a culture of inclusion for the public, registrants, staff and governance through the development of a comprehensive DEI framework that aligns with CRPO's mandate and regulatory responsibilities. | Ongoing until February 2025 |

| Domain | Resources | Status |
|---|---|---|
| Community and System Partner Engagement | Subject Matter Experts<br>• When developing regulations, standards, polies and guidelines, CRPO often seeks feedback from subject matter experts on the issues involved | Ongoing |
| | Indigenous Pathway proposal project<br>• Consultation process to guide CRPO's work in considering a better pathway to registration for qualified Indigenous practitioners who wish to be RPs.<br>• Goal of ensuring that individuals and communities who are affected by the regulation of psychotherapy can participate in meaningful discussions with the College. | TBD |

| Domain | Resources | Status |
|---|---|---|
| Complaints and Feedback | Accommodations policy<br>• Emphasizes that the CRPO is willing to accept any feedback on the processes in place | In development |
| | Accessibility webpage<br>• Emphasizes ability to provide feedback, questions or concerns to a member of staff | Completed, available online |

| Domain | Resources | Status |
|---|---|---|
| DEI Metrics and Goals | DEI Statement<br>• Outlines CRPO's commitment to diversity, equity and inclusion | Completed, available online |
| | College Performance Measurement Framework (CPMF)<br>• Reports the College's performance in domains<br>  ○ DEI strategy<br>  ○ the use of equity impact assessment tools<br>  ○ consideration of evolving public expectations related to DEI | Ongoing, available online each year |
| | Key Performance Indicators<br>• Registration – monitors whether CRPO decisions regarding internationally educated professionals are comparable with decisions for applicants educated in Canada. | Ongoing, posted on line each Council meeting |