



British Columbia's
Office of the Human Rights
Commissioner

NOVEMBER 4, 2022

The Honourable Jennifer Whiteside
Minister of Education
PO Box 9045, Stn Prov Govt
Victoria, BC, V8W 9E2

Via Email: ECC.Minister@gov.bc.ca

Dear Minister Whiteside,

I am grateful to staff in your ministry for sharing a draft of *Racial Equity Together: K-12 Anti-Racism Action Plan*, and to have the opportunity to provide input before it is published. As you know, my statutory responsibilities include making recommendations on government policy and programs to further the protection and promotion of human rights, and I believe this is accomplished most effectively through two-way, proactive consultation on initiatives such as this one.

I want to acknowledge the years of engagement the Ministry has undertaken in developing the plan and to commend the breadth of the plan's six priority areas of action. Where I see the greatest untapped potential, however, is in the ambition of the specific actions under each priority area. It is in this spirit that I offer several comments and ideas to strengthen the plan.

1. **Expand those included in "Community Voice":** I support your ministry's efforts to centre the voices of First Nations, Indigenous partners, education partners, community organizations, and students with lived experience of racism. These voices have indeed been long absent, as have others. It is important that the plan recognize the diversity within "community organizations" and "the IBPOC community" by committing to engaging with individual marginalized groups whose experiences of racism in education may be quite different. For example, immigrant and refugee families, and multicultural and multilingual organizations. I also urge you to add further dialogue mechanisms for direct engagement with school staff who have lived experience of racism.
2. **Robust accountability at the district level:** The draft plan notes that community and sector representatives asked for more accountability from leaders in the system, and I concur. The action to embed anti-racism reporting requirements within district strategic plans is an important step, but it will not by itself provide the needed accountability. For comparison, consider how the Ontario government's [2017 Education Equity Action Plan](#) embedded accountability for equity and human rights in performance appraisals for principals, supervisory officers, and directors of education. Ontario also provided funding to school districts to hire human rights staff who would lead implementation of the action plan. Equipping all education leaders with the skills, capacity, and incentives to identify and eliminate discriminatory practices is integral to combatting systemic racism in our education system. I urge you to take bolder action, following the lead of Ontario on this point. I believe having dedicated staff positions in each district is an important step towards real change in this area.
3. **A strong incident response system:** I understand your ministry is still in the early stages of scoping its incident response guidelines and resource guide, but I urge you to provide greater clarity and a stronger commitment to addressing such incidents. For example, it is not clear that new guidelines will

be binding on school districts, nor is there mention of reporting requirements to the Ministry and to the public. I am also concerned that the scope of the guidelines appears limited to incidents of racism rather than all incidents of discrimination under the *Human Rights Code*. As you know, my Office is undertaking a province-wide inquiry into hate incidents during the pandemic, and I believe our findings may be germane to this work. I welcome opportunities to collaborate on this action as it is developed.

4. **A broader vision for curriculum and training:** Once more I concur with the draft plan's assertion that anti-racism work starts with a foundational understanding of racism, equity, and inclusion. I recommend, therefore, that the specific actions under the areas of "Raising Awareness" and "Capacity Building" be expanded so that they are likely to achieve this goal. For example, I support closing gaps in anti-racism curriculum resources (and all anti-discrimination resources), but this would be much stronger as part of a set of actions that integrate changes to curriculum, resources, and training. The plan should address how learning outcomes related to racism, equity, and inclusion (established as targeted, achievable and transformative goals) will be woven across the existing curriculum, and what training teachers will receive to implement curriculum improvements. I support anti-racism training for everyone in the school system – including trustees – and I think training should be mandated where possible. But it is also true that foundational anti-racism training is only the first step. Teachers, for example, need specific training in anti-racist pedagogies. I urge you to add additional actions that will truly embed education about racism, equity, and inclusion into our schools and make our classrooms and our curriculum culturally reflective of, and responsive to, the lived experiences of every student in the room.

As the introduction to the draft plan rightly acknowledges, systemic racism and settler colonialism have shaped our province for generations, and the B.C. education system holds great responsibility for addressing this. There is no doubt this is a momentous task – one that calls for a set of truly bold and determined responses.

Thank you again for the opportunity to comment on the draft. As always, I appreciate the collaborative relationship we have built between my office and your ministry.

To support my commitment to public accountability and responsibility to serve the people of British Columbia, this letter, or portions of it, may be made public.

Sincerely,



Kasari Govender
Human Rights Commissioner

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