







2019/20 – 2021/22
Agency and Tribunal Cluster
Business Plan
Human Rights Legal Support Centre

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Section 1: Executive Summary

2017/18 Targets	2017/18 Achievements
90% of clients report being very satisfied or satisfied with HRLSC's services	 91% clients surveyed reported they were satisfied or very satisfied with HRLSC services
6 positive human rights stories in the media that featured the HRLSC's services	 26 positive human rights stories featuring the HRLSC's services, with over 100 print or broadcast items on our clients and services
110 cases are settled between mediation and before/at hearing	 114 cases were settled between mediation and before/at hearing
25,200 inquiries answered 83% of calls are answered	 23,198 inquiries answered 79% of calls answered
69% settlement rate at mediation	 63% settlement rate at mediation
80% of hearing-stage cases are settled at the hearing	 86% of hearing stage cases were settled at the hearing

KEY ACHIEVEMENTS

Settling cases before hearings allows the parties involved to participate in finding a resolution and often provides wider scope remedies that promote education, awareness and prevention. The HRLSC continued to be successful in settling a high percentage of cases throughout the human rights process and before a full merit hearing. The mediation program expanded our capacity to settle cases before hearings, resulting in a sustained increase in pre-hearing settlements of almost 50%.

While the mediation settlement rate was slightly lower than expected, the HRLSC's settlement rate continues to be higher than the Human Rights Tribunal's overall rate for cases settled at mediation (which was 59% in 17/18). Additionally, the number of cases settled by the HRLSC *before* mediation increased 15% from the previous year and 44%

over the past four years. Settling cases prior to mediation provides even earlier resolutions for the parties involved and increases the efficiency of the human rights system by diverting cases from the formal Tribunal processes. Turnover in HRLSC's lawyer staff due to low salaries has likely been a factor in not reaching our settlement targets as it generally takes inexperienced counsel a few years to gain experience and develop expertise in settlement negotiation.

The HRLSC continues to receive very positive ratings and feedback from clients who use our services. Feedback surveys also indicate that clients will recommend the HRLSC to other Ontarians in need of legal advice and information about *Code*-based discrimination.

The HRLSC's significant cases often receive media attention that informs and educates Ontarians about anti-discrimination laws, the impacts of discrimination, and options for addressing and resolving discriminatory incidents. HRLSC cases that received significant media coverage this year involved workplace sexual harassment, a service dog in a restaurant, a university's handling of a sexual assault complaint and workplace discrimination against pregnant employees.

Although the number of inquiries answered and the answer rate were lower than anticipated, a higher proportion of our calls were directly related to human rights issues. Each year the HRLSC receives inquiries that are not directly related to the *Human Rights Code*. The number of these non-*Code* related inquiries has decreased by 19% over the past four years. This decrease may be attributed to more use of our online resources that help people determine whether their experience was *Code*-based discrimination. Answering more inquiries directly related to discrimination under the *Human Rights Code* increases the length of time spent communicating with each caller as we gather more detailed information, provide further legal advice and offer options to resolve the issue. The implementation of technological tools to increase the responsiveness and capacity of our inquiry line is ongoing.

STRATEGIES FOR THE PLANNING PERIOD

Mediation Program

After five successful years of enhancing services, the HRLSC's award winning mediation program continues to demonstrate remarkable results. Although funding for the program has been cancelled, it is important to highlight the impact the mediation program brought to the human rights process. The program worked by utilizing a small group of non-lawyers to assist applicants in the pre-application stage of the human rights process. This allowed the HRLSC legal staff to focus on resolving HRTO matters at mediation and hearing stage. The results have been:

- An average increase of 136% in the number of individuals receiving in-depth legal assistance before mediation;
- An average increase of 84% in the number of individuals represented at HRTO mediations,

- An average increase of 75% in the number of settlements achieved before or at HRTO mediations;
- An average increase of 49% in the number of settlements achieved before HRTO hearings; and
- An average increase of 9% in the number of settlements achieved at HRTO hearings.

The Program resulted in more applications being settled earlier in the process and a reduction in the number of human rights applications that required full adjudication at the Human Rights Tribunal of Ontario (HRTO). This diversion of cases from the full adjudication process is a benefit to complainants, respondents and the overall efficiency of the human rights resolution process. The HRLSC estimates that the Mediation Program results in almost 150 fewer cases going to hearings annually. This represents an estimated savings of \$820,000 for the HRLSC and approximately \$400,000 in Tribunal hearing costs.

A review of the financial benefits of the mediation program indicates that case resolution via mediation at administrative tribunals is significantly cheaper than proceeding to a hearing in Court.

Loss of funding for the mediation program will result in significant service reductions for Ontarians who file applications with the HRTO. The impact of the cuts includes:

- A decrease in access to justice for Ontarians;
- A decrease in number of applicants who will receive in depth legal assistance prior to filing an application;
- A decrease in the number of Ontarians who will receive in depth legal interviews at mediation and hearing stages;
- A decrease in the number of Ontarians who will receive representation at mediations and hearings before the HRTO;
- A decrease in the number of settlements at all stages of the application process, which will reduce the efficiency of the HRTO process;
- An increase in non-meritorious human rights applications because fewer people will receive legal advice and information before proceeding with their application;
- Increased costs to the HRTO as fewer matters settle prior to hearing;
- Increased costs to respondents (including small businesses), who generally retain lawyers to assist with their cases. As matters are now more likely to proceed to hearing, the respondent's time and costs will increase; and
- Increased costs to claimants and respondents – emotionally and financially – which may delay their ability to get back to work and move on with their lives.

The loss of the mediation funding will reverse many of the gains made in settling more cases and settling them earlier for the benefit of all parties involved and in contributing to the timeliness of the Tribunal's case resolution processes over the five years the Program operated. This will have an adverse effect on the efficiency and timeliness of the human rights system.

Legal Services

Looking forward, the HRLSC will continue to provide high quality legal and support services (up to and including representation before the Human Rights Tribunal and appellate Courts where appropriate) in our continued effort to advance equality and promote human rights in the province of Ontario.

While reaffirming our commitment to provide advice, assistance and legal services to individuals whose rights, under the *Human Rights Code*, have been violated, the HRLSC will review our service model and determine which services will be reduced or eliminated beginning in 2019/20, as necessitated by the cancellation of the mediation program. The HRLSC will monitor the impact of its initial service reductions and make modifications as possible and if necessary throughout the planning period.

The HRLSC model of providing unbundled legal services is a cost efficient and effective method of resolving human rights disputes. This model allows the HRLSC to maximize our ability to achieve settlements throughout the human rights dispute process and has been estimated to be at least three times less costly than litigation models for claimants, respondents and taxpayers. Every effort will be made to ensure we continue to provide service within this model.

Communications

Cancellation of the mediation program may also have a negative impact on the HRLSC's successful communications strategies. Staff reduction may include loss of the Communication and External Relations Coordinator position.

The HRLSC's cases have received significant positive media coverage, contributing to a greater public awareness and understanding of human rights and discrimination issues. For example, our case about a black man being asked to pre-pay for a meal at a restaurant received extensive [media](#) coverage. This coverage helps to reduce the chance of future human rights complaints by increasing public understanding of discrimination, including for example, increasing awareness among restaurant owners of the importance of having practices and policies that are not discriminatory.

Continuing to develop and implement communications plans will be a priority, but the scope may be significantly limited with a reduced budget. Reductions in our communications capacity may also limit our ability to identify, monitor and plan for emerging human rights issues that affect our demand for services.

Serving Vulnerable Communities

Our priority will continue to be in the areas of discrimination with high public awareness or where we experience an increase in service demand, including sexual harassment, racial discrimination, particularly anti-black racism, Islamophobia, anti-Semitism and discrimination against Indigenous people and people with disabilities.

Partnerships

The HRLSC will maintain our partnerships with agencies that support women who are victims of sexual harassment and agencies that advocate on behalf of people with disabilities. Following up on our interim project with Legal Aid Ontario, which will end in early 2019, we will begin to work with the new legal clinic, the Black Legal Action Centre. We will participate in a CNIB initiative to develop legal resources for people impacted by blindness.

Digital Media Initiatives

We will continue to explore the development of digital media initiatives – including video, web tools, and apps - aimed at educating the public about their rights under the *Code* and the services of the HRLSC and enhancing our service capacity and efficiency.

Diversity and Inclusion

The HRLSC has built and maintains a workforce in which equity groups are represented at rates above the rates in the overall Ontario labour force, including in professional positions where diversity is often lower. Employment equity is monitored regularly and incorporated in human capital planning, including if staffing is reduced.

The 2016 survey of the lawyer group found that:

- 88.9% self-identified as female
- 47.1% self-identified as racialized
- 11.8% self-identified as Aboriginal
- 44.4 % self-identified as having a disability
- 5.6% self-identified as having a sexual orientation other than heterosexual

The HRLSC has adopted several equity-related initiatives to support a diverse workplace, including a comprehensive ongoing program of staff training on issues of equality and inclusion. Over the planning period, the HRLSC will continue to:

- provide training on equity and inclusion to all staff;
- meet or exceed employment equity goals;
- include equity/cultural competency in the regular performance appraisal process for all staff; and
- incorporate diversity values and equity/cultural competence in all job competitions.

Section 2: Mandate

LEGISLATIVE MANDATE

Pursuant to the *Human Rights Code*, the HRLSC provides advice, assistance and legal services to individuals whose *Code* rights have been infringed, including legal representation in applications before the Human Rights Tribunal of Ontario (HRTO). The HRLSC is required to “establish and administer a cost effective and efficient system” for providing services throughout the province “using such methods of delivering the services as the Centre believes are appropriate”. (*Code*, s. 45.12 and 45.13)

VISION AND MANDATE STATEMENTS

In fulfilling our legislative objectives, the HRLSC is committed to providing innovative services that promotes dignity and respect for all Ontarians by supporting a human rights system that is effective, efficient and responsive. The HRLSC’s Vision and Mandate Statements serves a guidepost to ensure that the work of the HRLSC remains consistent to these values.

Vision Statement

The Human Rights Legal Support Centre strives to be a leader in advancing equality, in protecting human rights and in supporting every person’s right to live and work with dignity and respect.

Mandate Statement

The Human Rights Legal Support Centre advances equality and protects human rights by providing a range of accessible and high quality legal and support services to those who have faced discrimination contrary to Ontario’s human rights laws.

GOVERNANCE

The HRLSC was established as a corporation that is independent from but accountable to the Government of Ontario. The *Code* further establishes a Board of Directors to govern the affairs of the organization. The HRLSC has a strong and diverse eight-member Board that represents various regions of the province. The Board brings a wide and varied skill set to the governance of the HRLSC. As a governance Board, the Board provides strategic direction and oversight to the organization.

The HRLSC is also governed by a Memorandum of Understanding (MOU) between the Attorney General and the Chair of the HRLSC Board. The stated purpose of the MOU is to:

- Establish the accountability relationships between the Minister and the HRLSC;
- Clarify the roles and responsibilities of the Minister, the Deputy Minister, the Assistant Deputy Attorney General, the Chair, The Board and the Executive Director;
- Set out the expectations for the operational, administrative, financial, auditing and reporting relationships/arrangements between MAG and the HRLSC.

With the guidance of the Board, the HRLSC will continue to work co-operatively with Ministry stakeholders to ensure that we continue to operate within the expectations of the governance framework, the Ministry's mandate and our own vision and mandate statements.

Section 3: Overview of Programs and Activities

For over 10 years the Human Rights Legal Support Centre (HRLSC) has worked towards the advancement of equality and the protection of human rights of all Ontarians. Through a range of high quality legal and support services, the HRLSC has met our legislative mandate of establishing and administering a cost effective and efficient system of providing services throughout Ontario.

Through our innovative programs, the HRLSC's fulfils our legislative mandate and honours the Provincial Government and the Ministry of the Attorney General's priorities. Our law student program and award-winning mediation program are prime examples of the methods the HRLSC utilizes to leverage scarce resources for the benefit of the public.

Our programs and services include:

- Telephone Intake Service
- HRLSC Website and Other Digital Platforms
- Legal Services and Representation (Early Resolution, Mediation and Hearing)
- Sexual Harassment Initiative
- Indigenous Service Program

Telephone Intake Service – Legal Information and Summary Legal Advice

The HRLSC provide legal assistance to callers via our toll-free telephone inquiry/intake line. HRLSC staff respond to more than 23,000 telephone, in-person and electronic inquiries annually, providing information that addresses how individuals can enforce rights under Ontario's *Human Rights Code*. Service can be provided in more than 200 languages through simultaneous interpreting services.

Our trained Human Rights Advisors, are not only able to analyze and assist in instances where the Code has been violated but of equal importance is their ability to divert matters that are not appropriate Code issues. In these circumstances, our staff's advice directs callers to more appropriate forum thereby diverting matters that are not related to human rights away from the Tribunal process. This service help to increase the efficiency of the HRTTO and saves respondents from unnecessary human rights litigation.

Early resolution

Even prior to a human rights application being filed, the HRLSC staff, where possible, will attempt to resolve the matter. Our early resolution efforts have remained consistent over the years; we will continue to make efforts to divert applications from the human rights system. The number of settlements achieved after a human rights application has been filed but before a mediation has taken place have increased steadily over the past four years. Diversion reduces the personal cost to the applicant, the financial cost to the respondent and the public costs associated with a full hearing to the human rights system. Early resolution helps the HRLSC in our efforts to support MAG and the provincial government in reducing public costs.

Legal Service and Representation

The Centre has employed many innovative ways to ensure that our clients receive the highest quality of legal services. The HRLSC continues to offer unbundled services to maximize the number of clients we can serve. Throughout each stage of the application process, HRLSC staff make every effort to resolve human rights disputes through negotiation with the other party. Despite the loss of mediation funding, the HRLSC will continue to provide representation at mediations and hearings before the HRTTO. This service is part of our core service delivery model. A review of our case selection criteria will be reviewed, and adjustments will be made according to our funding allocation.

Province-Wide Services

The HRLSC continues to believe in the importance of regional representation – where possible – for our clients. The presence of our staff in Hamilton, London, Guelph, Windsor and Thunder Bay reduces our travel costs and brings greater provincial awareness of the HRLSC's services and the human rights system. The HRLSC hopes to maintain our regional offices providing we are able to do so within our financial resources.

Website and Other Digital Platforms

To ensure our service is accessible to all Ontarians, legal information and summary advice is offered via several different methods. Service users may access our website to use plain language tools that, among other things will help a user determine whether

certain conduct fall within the purview of the *Human Rights Code*. Additionally, our self-help guides provide valuable information regarding procedural matters such as how to present one's case before the Human Rights Tribunal of Ontario. Use of our website has increased by more than 25% each year for the past three years with over 150,000 visitors to our site annually. Moreover, our presence on social media platforms – including Twitter and Facebook – serves to increase awareness of the HRLSC and the human rights system generally.

We will continue to explore options to update our website to make it more appealing and user friendly. To embark on this project, we will reexamine our resources to determine whether there is scope to take on a reorganization of our website. We will continue to explore this and other digital initiatives to make our services more accessible to Ontarians who have faced discrimination.

Sexual Harassment

Over the past few years the HRLSC has developed a program that focuses on service to survivors of sexual harassment. In the era of the #MeToo Movement, the HRLSC has partnered with the Barbra Schlifer Commemorative Clinic to increase awareness of the Human Rights Tribunal process is a viable alternative to criminal and civil actions as a means to redress incidents of sexual violence particularly in the workplace. Adjudicating these matters via the HRTTO process is less costly (emotionally and financially) for the survivor. Over the past year, the HRLSC has noted a steady increase in the number of cases in which sexual harassment and/or solicitation is at least one ground claimed in our cases. The HRLSC remains committed to providing service to this vulnerable community. In addition, we will be submitting a proposal for a federal government initiative that, if received, will result in increased service to victims of workplace sexual harassment.

Indigenous Service Program

The HRLSC continues to see strong increases in service to Indigenous communities. Ontario's Indigenous communities continue to experience significant discrimination in many aspects of daily life. The increase in service to Indigenous clients is the direct result of years of targeted outreach to those communities through the positive partnership with the Ontario Federation of Indigenous Friendship Centres (OFIFC). This relationship will continue on a smaller scale now that the project funded by the Law Foundation of Ontario has concluded. The HRLSC is committed to ensuring that Indigenous peoples continue to be informed of the human rights process as a means of pursuing their rights.

Section 4: Environmental Scan and Risks

External Factors

Legislative, regulatory or policy changes

In June 2018, a new government was elected in Ontario. Early into its mandate, the government conducted reviews of the province's finances and has reported that Ontario is running a deficit of 15 billion dollars. As a result, the government has signaled that across the board constraints will be put in place to manage the province's finances.

Review of Provincial Agencies

In November 2018 the government issued its Fall Economic Statement, the document announced that a task force has been convened "to lead a comprehensive review of Ontario's Provincial agencies". The stated focus of the task force will be on:

- Identifying immediate opportunities to enable efficiencies;
- Ensuring agencies remain transparent and sustainable over the long term;
- Ensuring agencies use taxpayer dollars appropriately and effectively;
- Aligning agencies with current government priorities; and
- Ensuring agencies have appropriate oversight structures in place.

The HRLSC will participate fully with the task force review, through which we hope to demonstrate the HRLSC's significant contribution to a cost effective and efficient human rights system that benefits Ontarians, including human rights claimants, respondents and the government.

Review of Tribunals and Tribunal Clusters

The Fall Economic statement also announce a review of tribunals and tribunal clusters. In discussing Access to Justice, the government stated:

To improve access to justice and promote program efficiency, the government plans to review those adjudicative tribunals and tribunal clusters that are accountable to the Ministry of the Attorney General. This review is part of the government's plan to ensure that programs are effective, affordable and sustainable.

The impact of the recently announced clustering or combining of the adjudicative tribunals on the Human Rights Tribunal of Ontario is not yet clear. However, given that much of the HRLSC's work is dependent on the processing of applications at the HRTTO, any adjustments that may be made to the scope of the HRTTO will directly impact the HRLSC's services. The HRLSC will strive to maintain flexibility in adapting our services to changes at the HRTTO with the goal of continuing to ensure that human rights claimants have our legal assistance to support the timely resolution of their cases.

While the government is preparing to review the adjudicative tribunals and tribunal clusters, the HRTO is experiencing a significant increase in human rights applications filed. The HRTO has indicated that this increase is not restricted to a particular ground or service area. This increase in applications, is likely to result in greater demand for HRLSC services.

Continuing with emerging developments at the HRTO; the Tribunal is also experiencing a shortage in vice chairs and members. The HRLSC is informed that the HRTO is currently working with 60 per cent of their normal compliment of adjudicators. The HRLSC is already feeling the consequences of this shortage (i.e. cancellation of mediations and delays in the processing of applications). The HRLSC will continue to monitor this situation closely.

Reductions in HRLSC services will result in fewer cases settled early in the process and before full hearings are held, compounding delays at the Tribunal.

Changes and trends in the operating environment

Societal Factors

Ontario continues to experience an increase in the number of individuals reporting incidents of hate crimes. A recent report indicated that black people were the most common targets of hate crimes. With regards to religious affiliation, the Jewish community saw the biggest increase in hate crimes in 2017, followed by Muslim citizens. In addition, Statistic Canada is also reporting an increase in incidents of sexual assaults in Ontario.

As a result, the HRLSC expects to see an increase in inquiries and applications filed by members of the black, Jewish and Muslim communities. An increase in applications from survivors of sexual harassment and violence is also expected.

Hate Crime: <https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2018051-eng.htm>

Sexual Assault: <https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2018036-eng.htm>

Internal Factors

Implications of Loss of Mediation Program

The loss of funding for this Program will result in reduced staffing and HRLSC service delivery. At the same time, given the external factors references above, we expect the demand for HRLSC services to remain or grow. Compounding the challenge faced by staffing cuts is the HRLSC's inability to provide adequate increases to lawyer salaries. HRLSC lawyer salaries remain substantially lower than compensation levels for lawyers within government, at the other provincial human rights agencies and at other Ontario operational service agencies, including Legal Aid Ontario. The contraction of the

HRLSC budget will result in a reduction in lawyers which will result in greater demands placed on the remaining staff. The HRLSC will risk losing staff due to the lawyers' workload and low salaries.

In response to the loss of funding for the mediation program, the HRLSC will conduct a review of its services to determine how best to adjust our service delivery models to meet the continuing demand for service. In the 19/20 and subsequent fiscal years, the HRLSC will develop a plan that will:

- Respond to our current fiscal and staffing challenges;
- Implement and monitor changes to the service delivery model;
- Develop strategies to attempt to mitigate lowered staff morale that will result from the loss of the mediation program; and
- Utilize technology to help process requests for assistance.

Section 5: Strategic Directions and Implementation Plan

Strategic Direction and Implementation

Environmental Influences, Risks and Planning Assumptions

Planning assumptions will continue to be revised based on the cancellation of the mediation program. Assumptions include a consistent or increased demand for services at all stages of the human rights process.

Data regarding service usage and the social areas and grounds of discrimination in our cases will continue to be used to identify and monitor trends and inform our short and longer-term service planning. Based on current data, we expect continued increases in service needs in the areas of Indigenous services and sexual harassment.

The HRLSC continues to be concerned with the rate at which matters are getting to hearing and mediations at the Human Rights Tribunal. We note from the Tribunal's quarterly statistics that the number of new human rights applications, and matters pending, continues to increase. As the volume of our work – at mediation and hearing stage – is directly linked to matters scheduled at the Tribunal, we are anticipating an increase in the demand for HRLSC services as the Tribunal works to resolve these outstanding matters.

Performance Measures

Over the upcoming planning period, the HRLSC will continue to implement our strategic mandate – to advance equality and protect human rights by providing a range of accessible and high quality legal and support services. We will continue to meet this

objective by pursuing innovative programs that operate within our budget allocation. Programs we will continue include:

- Early Resolution of human rights disputes;
- Representation (Mediation and Hearings);
- Anti-Discrimination Intensive Program (law student program);
- Partnerships

Early Resolution

The HRLSC recognises the importance of early resolution as a key strategy to control both HRLSC and system costs. As such, we will continue our efforts to help clients resolve human rights matters early. However, a significant challenge will be accomplishing this within fiscal constraints. Early resolution of matter will benefit the HRLSC by removing client files from the system, freeing up our staff to take on more matters, maintaining a high level of service to Ontarians. Staff at all levels will be encouraged to seek opportunities to resolve matters. The HRLSC will continue to monitor the settlement rate of applications before the HRTO.

Legal Representation

The HRLSC will continue our core program of providing legal representation to Ontarians who have experienced discrimination related to the *Code*. The HRLSC will require significant adjustments to our service delivery model. These changes will unfold and be adjusted over the upcoming planning period. It is also anticipated that in year modifications will be necessary as the HRLSC monitors the impact of the loss the mediation program.

Law Student Anti-Discrimination Intensive Program (ADIP)

The experiential education program that HRLSC partners with Osgoode Hall Law School has been a benefit to the students enrolled in the program as it enables them to hone legal skills that are transferable to all areas of law. At the same time the ADIP Program enhances the HRLSC's front-line service capacity. Students spend a portion of their placement on intake, increasing our front-line service capacity by almost 20%. This contribution helps the HRLSC to maintain reasonable call answer rates and wait times for inbound calls. The program gives the HRLSC the equivalent of two additional FTEs on our intake team. The student participation in other areas of Centre work also serves to enhance the service we provide to our clients. The HRLSC will continue its valuable partnership with the law school.

Regional Locations

The HRLSC has legal staff in community legal clinics in, Hamilton and Windsor. Additionally, we have relationships with non-governmental agencies in London and Thunder Bay that allow us to embed our staff in these service agencies. This has given

the human rights system a regional presence, without the cost of establishing independent infrastructure and has reduced travel costs for representation at mediations/hearings in those regional centers. The regional locations will be reviewed during the planning period considering the cancellation of the mediation program. However, it is expected that eliminating regional locations may not be a cost-effective option when the modest cost of maintaining the regional locations is balanced against the increased travel costs of sending GTA staff to mediations and hearings in the regional locations.

Other Partnerships

The partnerships the HRLSC engages in is an important opportunity to increase awareness of our services and the human rights system. Increased awareness will ensure that the HRLSC fulfils its goal of providing greater access to justice to Ontarians who have experienced Code based discrimination. The HRLSC will continue to foster healthy relationships with agencies that provide similar or complementary service to Ontarians who experience discrimination.

Diversity and Inclusion

The HRLSC is committed to continuing its ongoing internal initiatives to promote inclusion and diversity in the workplace including:

- Ongoing employment equity planning, monitoring and reporting
- Supporting the initiatives of the Equity and Diversity Committee
- Training on a range of diversity topics, such as ally-building, anti-oppression training and anti-black racism, as possible
- Identification of diversity goals in job description and performance requirements of Executive Director
- Maintaining diversity and cultural competence as required components of all job descriptions
- Including questions related to diversity and equity in all job competitions
- In accordance with the Law Society of Ontario requirements, development of a Human Rights and Diversity Policy.

Section 6: Human Capital Plan

Strategic Context

The HRLSC's human capital planning is integrated with its operational and service planning and strives to reflect the core organizational values of substantive equality, accessibility, excellent quality of service and transparent processes. This integration and these priorities are incorporated throughout human resources decision-making, from executive compensation to salary structure decisions. Planning and decision-

making in the organization is managed within the context of the commitment to access to justice, service excellence, innovation and effectiveness.

Assumptions for planning incorporate the cancellation of the mediation program and expected service demands based on our service data and statistics as well as data from the Human Rights Tribunal. However, at the time of writing decisions regarding the staffing reductions resulting from loss of the mediation program have not been finalized. Staffing plans may be updated once staffing changes are finalized.

At the Board level, change will continue through 2019, as long-term members finish their service and recently appointed members become established.

Staff Numbers*

Type	2019/2020	2020/2021	2021/2022
Permanent	42	42	42
Part-Time	2	2	2
Temporary	2	2	2
Total	46	46	46

Management, union and non-union staff

Type	2019/2020	2020/2021	2021/2022
Management	7	7	7
Lawyer Group	14	14	14
Union - OPSEU	22	22	22
Non-Union	3	3	3
Total	46	46	46

*staff numbers are tentative and may change depending on outcome of service changes and staff layoffs.

Approximately 48% of staff are unionized (OPSEU, Local 525), with the current collective agreement expiring on December 31, 2018. Negotiations for a new agreement will begin early in 2019.

Management and Accountability Framework

The management group, led by the Executive Director and with the support of the administrative team, develops and manages human capital planning through the service and operational planning processes. Strategies are developed, implemented, analyzed and modified when circumstances change or when evidence indicates that different approaches are needed.

Senior management oversees the linkage of human capital planning to the strategic direction set by the Board of Directors.

Workplace Demographics

Age Demographics

- 20% of the HRLSC staff is between 25 and 34 years old.
- 44% of the HRLSC staff is between 35 and 44 years old.
- 29% of the HRLSC staff is between 45 and 54 years old.
- 12% of the HRLSC staff is between 55 and 64 years old.

Human Resource Strategies

Service delivery needs, strategic goals and fiscal realities are the most significant factors impacting human capital planning and management, with the overarching goal of maintaining a diverse, inclusive and healthy workplace. A collaborative, integrated approach with HRLSC's teams and the union, regarding changes that affect day to day work, work volume or related service policies, support effective team functioning and the successful implementation of modifications or adjustments.

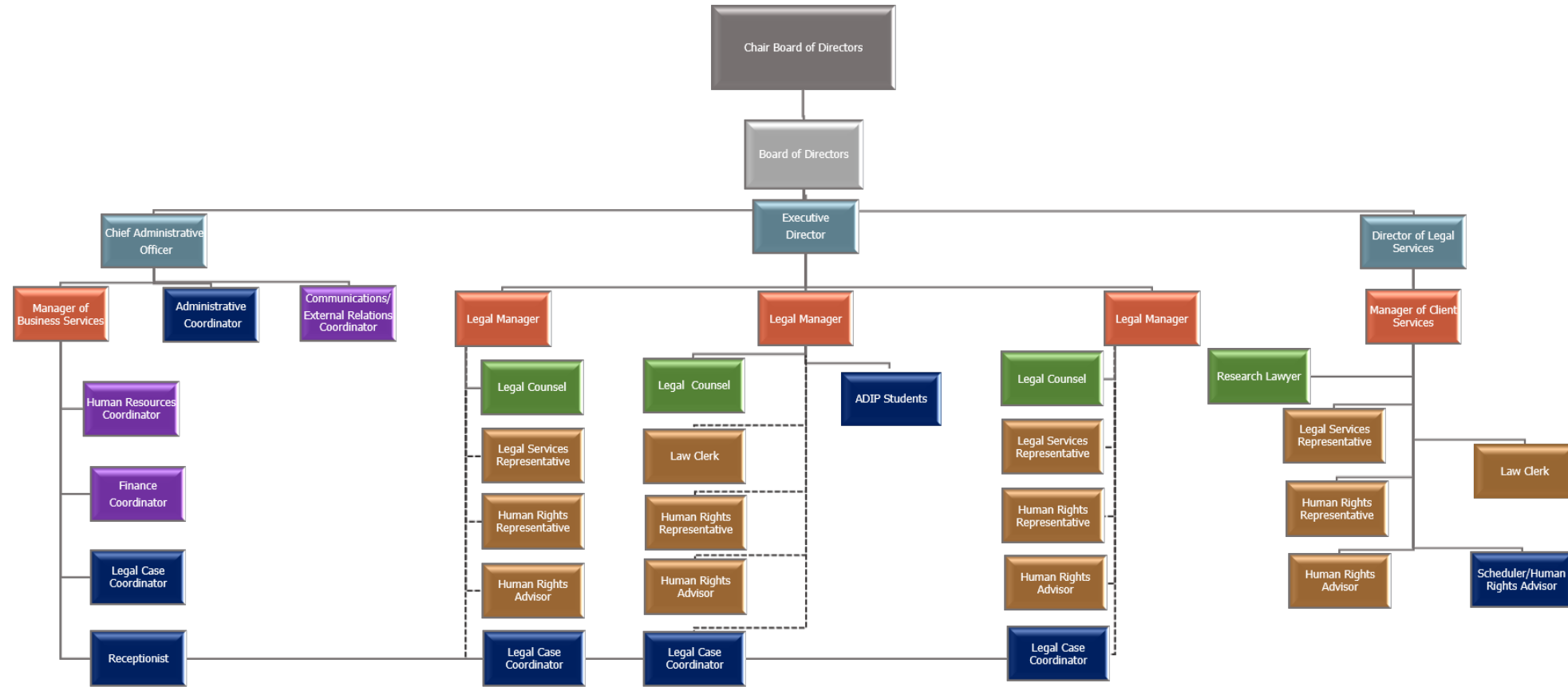
With 40% of the HRLSC's staff unionized and a collective agreement ending in December 2018, a priority will be to conclude negotiations for a new collective agreement as early as possible in 2019.

We will strive to continue to reflect flexibility and innovation in human capital planning and maintain as much as possible alignment with the plans and priorities outlined in the operational and strategic plans, while recognizing that plans and targets may have to be modified to reflect staffing limitations.

The overarching priorities for the planning period include:

- Maintaining a diverse, inclusive and healthy workplace, including meeting or exceeding employment equity goals;
- Addressing, to the extent possible, lowered staff morale resulting from the loss of the mediation program;
- Retaining experienced legal staff;
- Achieving competitive and sustainable salary structures for unionized and non-unionized staff
- Maintaining staff structures that promote service flexibility, digital service delivery and staff development, as possible;
- Finalizing an executive compensation plan;
- Achieving effective Board succession;
- Implementing an employment engagement plan; and
- Maintaining training opportunities, if possible.

Human Rights Legal Support Centre Organizational Chart



Human Capital Planning Goals

Goal: Maintain and enhance a diverse, inclusive, healthy and flexible workplace and culture

Initiatives & Strategies

- Meet or exceed employment equity targets through targeted recruitment processes and increasing diversity in the management group;
- Offer development and mentoring opportunities, when possible;
- Maintain, review and adapt flexible workplace policies;
- Consult with staff teams regarding changes to duties or structures;
- Enhance internal communications with staff and management through periods of change;
- Provide resources to support staff who may be at risk of layoff and the morale of staff whose positions will remain
- Provide progressive training or resources that address issues related to inclusivity, mental health and other issues identified by staff or management, as possible; and
- Continue to utilize employee/employer relations committee.

Goal: Achieve competitive and sustainable salary structure

Initiatives & Strategies

- Continue to prioritize lawyer salaries in financial planning, as possible;
- Revise salary structure for non-lawyer staff;
- Balance progress toward achieving competitive salaries with staffing reductions; and
- Implement executive compensation program, in accordance with Broader Public Sector Executive Compensation Framework or other new legislation.

Goal: Retain legal staff

Initiatives & Strategies

- Continue to prioritize lawyer salaries in financial planning;
- Continue to offer training and development opportunities, as possible; and
- Continue to promote healthy workplace and work/life balance.

Goal: Develop and enhance structures to promote service and organizational flexibility and staff development

Initiatives & Strategies

- Modify team structures as required; and
- Develop digital service committee with representation from various staff groups.

Goal: Promote smooth Board succession and transition

Initiatives & Strategies

- Utilize comprehensive governance and accountability materials developed by the Board to provide a foundation and structure for the new Board members; and
- Provide opportunities for skill sharing during overlap period between the expected appointment of new members and the departure of long term members.

Goal: Promote employee engagement and satisfaction

Initiatives & Strategies

- Share information with staff during periods of change;
- Respond to issues resulting from lowered staff morale; and
- Develop and deploy employment engagement survey as possible.

Goal: Maintain or enhance training opportunities

Initiatives & Strategies

- Continue to provide training, in accordance with current needs and the scope of the HRLSC's work, if financially possible.

Section 7: Information Technology (IT) / Electronic Service Delivery (ESD) Plan

The highest priorities for the short term include completing changes and upgrades to the IT infrastructure and client tracking tool (CTT) and an updated intake phone system, to better support and integrate electronic service delivery pilots. An updated phone system is needed as the current system is outdated and at risk of failing. One goal is improve the management of call volumes through a combination of IT and staff scheduling changes. That goal may need to be revised to managing higher call volumes due to the reduction in in-depth legal services.

Completing implementation of a client portal, piloting an associated online access system and increasing the capacity of the automated interview scheduling module to increase efficiency and ease of access for clients continue to be high priorities. These initiatives will also build in flexibility to implement service delivery changes and support the HRLSC's ability to manage a changing caseload. Feedback and suggestions from staff and data collected from client or website user feedback will continue to be tracked and incorporated into digital services planning. A digital services planning group, comprised of staff from various service delivery areas, if feasible, may be formed to further support the development and implementation of electronic service delivery initiatives and pilots.

The layout of the HRLSC's open data will be improved to make it easier for media, researchers and stakeholders to access detailed HRLSC service data.

Analytics will continue to be utilized to understand web site usage and inform changes and additions. We will continue, as finances permit, to explore the use of web-based tools, including videos, to support the delivery of clear and accessible legal information and the HRLSC's unbundled legal service delivery model.

Longer term, systems will also be updated to further improve the flexibility and potentially, the scope of statistical data. For example, the possibility of cross referencing statistical data on social areas and grounds of discrimination will be investigated, potentially in collaboration with the Ontario Human Rights Commission.

Enhancements to reporting functionality will continue to be developed over the longer term, to increase efficiency and support service analysis and planning. Improved caseload and intake reporting contributes to the HRLSC's ability to:

- Make evidence based decisions regarding services and needs;
- Try new initiatives or approaches;
- Measure and analyze results and determine whether further adjustments are necessary; and
- Provide information and data to the public and respond to media inquiries.

All ongoing and longer term projects will be dependent on available funds.

Enhancements to the HRLSC's IT disaster recovery plans would support the HRLSC's business continuity plans, but improvements in this area will be scaled to available funds.

Section 8: Initiatives Involving Third Parties

Anti-Discrimination Intensive Program (ADIP)

Now in its 7th year, the Anti-Discrimination Intensive Program continues to be an important partnership for the HRLSC. The program places 12 law students (6 each semester) with the HRLSC every year. Students learn practical legal skills and

discrimination law, under the mentorship of an HRLSC lawyer. In return, the students enable the HRLSC to augment our services, particularly at intake. Once trained, the ADIP program provides the equivalent of two additional intake workers, helping our intake service to respond to more inquiries (i.e. achieve a higher answer rate) and reduce telephone service wait times. Additionally, the students assist our pre-application interview service, supporting our ability to maintain reasonable wait times for interviews. Although the HRLSC incurs costs for the program, the benefits far outweigh the costs and maintaining ADIP is a priority.

Legal Clinics

The HRLSC will continue to partner with various community legal clinics around the province. In addition to housing three of our regional lawyers, legal clinics and HRLSC regional staff participate in joint community activities throughout the year. These partnerships increase access to justice for vulnerable citizens and they also serve to build citizens awareness of the HRLSC in particular and in Ontario's human rights system in general.

Aboriginal Intensive Program

The HRLSC will again host a student from Osgoode Hall's Aboriginal Intensive Program. The Program places a student at the HRLSC, full time for 8 weeks. During this time, the student is full immersed in the HRLSC's delivery of service to Indigenous communities. The student will be paired with one of our Indigenous staff members and will assist the lawyer in delivering culturally appropriate service to Indigenous clients.

Pro bono Students Canada

The HRLSC has joined other non-profit organizations (including the OHRC, CHRC and OFIFC) to support pro bono students Canada's application for the Emil Gumpert Award Grant. If successful, the PBSC will establish a program to deliver culturally appropriate human rights assistance to Indigenous communities. The HRLSC will assist by offering our expertise in training the student participants.

Canadian National Institute for the Blind – Know Your Legal Rights legal information project

The HRLSC has agreed to participate in the CNIB's initiative to develop legal resources for their community. Funded by the Law Foundation of Ontario and supported by ARCH Disability Law Centre and Community Legal Education Ontario (CLEO), the HRLSC has been asked to share our resources and expertise, review the new and adapted information created by CNIB and to assist the CNIB in growing their support networks. This program will increase awareness and understanding of the HRLSC's services and the human rights system in Ontario.

Government of Canada, Department of Justice

The HRLSC has submitted a proposal for funding for the Department of Justice initiative to increase public awareness and provide access to legal information and advice for persons who have experienced workplace sexual harassment. If success, this partnership will begin in the upcoming planning period.

Community Legal Education Ontario

The HRLSC has concluded the final stage of this three-year, multi-site project which was led by Community Legal Education Ontario (CLEO) in partnership with the York Institute for Social Research. The project was funded by the Law Foundation of Ontario. Overall, the HRLSC was able to gather extensive data from former clients who utilized our self-help information. The data has been turned over to the researcher who will complete the final report.

Ontario Federation of Indigenous Friendship Centres (OFIFC)

From 2015 through 2018 the HRLSC and the OFIFC partnered for a successful, innovative program to promote access to legal services for Indigenous people experiencing discrimination. The initiative was funded by the Law Foundation of Ontario and resulted in training for Friendship Centre staff and the production of a video that explained discrimination and highlighted the HRLSC's services. The HRLSC will continue to pursue opportunities for further partnerships with the OFIFC through our Indigenous Services Outreach Committee.

Section 9: Communication Plan

The HRLSC has a flexible communications strategy to provide the public with understandable human-interest stories about discrimination, human rights and the Centre's services. When possible, we also target specialty publications such as the *Law Times*, the *Human Resources Reporter* and key audience publications to provide more technical stories about the law and human rights enforcement.

The current vacancy in the Communications Coordinator position and the uncertainty of the HRLSC's ability to fill the position due to lack of funding may have a significant negative impact on communications outcomes over the planning period. Plans will be modified as necessary.

The HRLSC's ongoing communications strategy involves:

- Creating opportunities with mainstream and community media to bring the stories of our clients to the attention of the broader public across the province.
- Targeted communication and collaboration with community-based services and partner organizations.
- Distributing media releases on key cases that illustrate systemic discrimination and have a broad impact across Ontario.

- Responding in a timely manner to all media inquiries and assisting journalists who are looking to understand the issues and the process.

Target Audiences

- Generally, people who live in Ontario;
- Communities that are designated status under the *Code* with emphasis on hard-to-reach, under-serviced economically disadvantaged communities and linguistic minority communities;
- Community agencies serving *Code*-designated constituencies – local, regional and province-wide;
- Point-of-access services (e.g. settlement agencies, 211, Service Centres, call centres such as the Ministry of Labour’s Employment Standards hotline, etc.);
- Community legal clinics; and
- Existing community and human rights organizations and networks.

Key Messages

- There is help for people in Ontario who are being discriminated against.
- Individuals can take effective action to address discrimination.
- The human rights system provides an accessible alternative to the criminal and civil courts.¹
- Human rights claims are being resolved, mediated, litigated and decided, efficiently and effectively.
- Discrimination continues to have a negative impact on the lives of Ontarians in their everyday lives including workplaces, access to services and searching for or maintaining housing.
- Employers, service providers and landlords need to abide by the law.
- The HRLSC can develop systemic solutions to protect people living in Ontario from future discrimination.
- The Centre weighs evidence, credibility and a host of factors, in determining whether to proceed with a human rights case and only takes on meritorious claims.

Media

With the loss of staffing, media work may need to be scaled back. The HRLSC ongoing plan is to maintain or enhance relationships with mainstream, specialty, ethno-specific, language-specific and community media. We tailor messages of relevance to specific communities and emerging issues. The HRLSC has established itself as a trusted

¹ [Ontario Human Rights Tribunal gains steam as alternative route for sexual assault cases](#). Globe and Mail, April 3, 2018.

resource for journalists on human rights and access to justice issues, as well as offering background statistics and information to provide context for related stories and plans to continue to provide information and data as our resources allow.

Social Media

The HRLSC's will aim to maintain its modest social media presence in English and French, as resources allow. Maintaining a robust social media presence supports increased public awareness and understanding of the human rights and discrimination and the HRLSC's services.

Public Legal Education Materials

The HRLSC mandate does not include public education or community outreach – these fall within the mandate of the Ontario Human Rights Commission. As the HRLSC can respond quickly to emerging issues, as resources allow, we will continue to provide tailored materials for disadvantaged communities when those materials are not readily available from other organizations.

The HRLSC will continue to develop and update information sheets and procedural guides designed to assist self-represented applicants at the Tribunal. Our website allows users to provide feedback about individual information sheets. We vary content, format and placement based on the results.

Videos

In efforts to promote the HRLSC's legal services to a wider audience, specifically focusing on a younger demographic of people in Ontario, creating videos in English and French with closed captions is an opportunity to explore new ways of engagement. As resources allow over the planning period, the HRLSC will develop videos that highlight examples of how a person living in Ontario can file a human rights claim, scenarios of what a case may look like and how cases can be settled.

Section 10: Diversity and Inclusion Plan

The HRLSC has adopted equity-related initiatives to support a diverse workplace, including a comprehensive ongoing program of staff training on issues of equality and inclusion. Over the planning period, the HRLSC will continue to:

- Include equity/cultural competency in the regular performance appraisal process for all staff;
- Incorporate diversity values and equity/cultural competence in all job competitions; and
- Provide training on equity and inclusion to all staff and students, as financially viable;

In addition, and in accordance with the new obligations set for all licensees by the Law Society of Ontario, each lawyer and paralegal will create and adopt an individual Statement of Principles that acknowledges each person’s obligation to promote equality, diversity and inclusion. Additionally, the HRLSC will develop a Human Rights and Diversity Policy that specifically addresses issues of diversity and inclusion.

Section 11: Multi-Year Accessibility Plan

AODA Area	Action	Completion Date
Customer Service	<ul style="list-style-type: none"> • Survey clients who requested accommodation in the delivery of service; follow-up with reviews if any client accommodation needs not met • Implement ASL Video Integration or Skype Integration to provide remote interpretation for hearing-impaired members of the public and clients who use ASL • Review accommodation practices; update as necessary 	<ul style="list-style-type: none"> • Ongoing • Ongoing • Ongoing (Significant review and update to be completed by December 2019)
Procurement	<ul style="list-style-type: none"> • Monitor procurement policies to ensure consistency with best practices (policies and practices have been updated to include accessibility considerations) 	<ul style="list-style-type: none"> • Ongoing
Training	<ul style="list-style-type: none"> • Train staff on equity and accommodation issues; consult with staff on training needs • Support disability-related initiatives of Diversity & Inclusion Committee 	<ul style="list-style-type: none"> • Ongoing • Ongoing
Information and Communications	<ul style="list-style-type: none"> • Maintain website with enhanced accessibility features • All public documents are available in WORD. • All correspondence includes notification that other accessible formats are available. 	<ul style="list-style-type: none"> • Ongoing • Ongoing • Ongoing

Employment	<ul style="list-style-type: none"> • Employment equity survey of staff • Accommodation needs survey of staff • Monitor progress toward meeting/maintaining accessibility goals • Ensure that applicants are aware of commitment to accommodate in recruitment process and if offered the position. 	<ul style="list-style-type: none"> • 2019 • 2019 • Ongoing • Ongoing
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Section 12: Three-year Financial Plan

The most significant financial challenges facing the HRLSC in meeting its objectives are maintaining capacity to deliver legal services that allow individuals who have experienced discrimination to understand their options, provide advice and information and settle cases early without the mediation program funding and, secondly, finding funds to make progress toward achieving or maintaining competitive salaries.

These significant risks and related pressures will be mitigated through planning, regular analysis and assessment of expenditures and forecasts to align with service delivery goals, with adjustments made as necessary. The HRLSC’s ability, as a small agency, to be flexible and respond quickly to changing circumstances, supports this risk mitigation strategy. Benchmarking HRLSC’s service and staffing costs shows that HRLSC’s costs are comparable to or lower than legal service organizations of similar size. Costs are shared with partners, such as Osgoode Hall, to support the maximization of the HRLSC’s financial resources. The Osgoode student program (ADIP), which provides a value of approximately \$110,000 (the equivalent of two front-line staff positions), will continue through the planning period. Additional strategies include seeking one-time funds to support IT efficiency initiatives and digital service delivery goals.

The risk related to achieving competitive salaries is managed through ongoing planning, monitoring and reviewing of human resource needs and costs, while ensuring alignment with service delivery goals and targets. Vacancy management is implemented when unavoidable. Human resource changes are planned and analyzed with the goal of achieving salaries that are competitive in the broader public sector. The HRLSC will eliminate positions, reduce services and modify performance targets and goals to meet fiscal realities. The specific reductions will be determined in early 2019 and implemented in 2019/20.

Planning for the upcoming three-year period includes preparing detailed analyses of previous years’ expenditures and identifying efficiencies, mainly in corporate ODOE expenses. Examples of efficiencies include accessing consolidated services or service

partnerships where possible and renegotiating or procuring new service contracts, both of which have resulted or will result in operating cost reductions.

General staffing projections, in conjunction with forecasted service demand and caseloads, have been incorporated into fiscal planning for 2019/20 and future years. These projections are analyzed and modified on an ongoing basis to ensure that funds are utilized most effectively, and financial risks are identified early.

The HRLSC's only significant capital assets are its IT systems, which are managed over a three or five-year amortization period. By staggering replacement and upgrade dates, the HRLSC ensures that the financial impact is spread over multiple years. Capital IT projects are planned to maximize efficiency gains and implemented based on available funding. Results are evaluated for efficiency or service capacity gains.

The variances outlined in the budget below are due to vacancies created by temporary medical or other staff leaves. Variances are monitored and managed throughout the year and resources are realigned to ensure the most effective use of funds, with a priority of utilizing or realigning funds to support direct services.

Multi-Year Operating Budget

Expense Category	2018-19 Budget	2018-19 YE Forecast	Explanation of Variance	2019-20 Budget	2020-21 Budget	2021-22 Budget
Operating						
Salaries and Wages (S&W)	3,831,396	4,163,817	Vacancies not filled due to reduction in mediation program funds.	3,765,000	3,765,000	3,765,000
Benefits	766,279	812,648		753,000	753,000	753,000
ODOE	696,525	800,735		778,200	778,200	778,200
Board Expenses	42,000	42,000		40,000	40,000	40,000
TOTAL Operating	5,336,200	5,819,200		5,336,200	5,336,200	5,336,200
Revenue						
Core Funding	5,336,200	5,336,200		5,336,200	5,336,200	5,336,200
Mediation Funding	600,000	483,000				
Carryover						
TOTAL Revenue	5,936,200	5,819,200		5,336,200	5,336,200	5,336,200

Section 13: Performance Measures and Targets

Performance measures and targets have been revised to reflect the initial cancellation of the mediation program, however further revision may be necessary once the areas of service that will be reduced are determined and initial impacts monitored. Except for intake, service reductions have been reflected almost equitably in these targets, but the actual impacts may be greater than expected in some areas and targets may need to be further revised. Strategies will continue to be developed to reduce the impact service reduction will have on our intake service, as human rights claimants will contact our intake lines repeatedly if we are unable to provide more in-depth legal services.

The HRLSC collects and analyses other detailed, comprehensive data about our services in addition to what is reflected in these targets.

1. **Performance Measure:** Ontarians who believe they have experienced discrimination have access to human rights legal information and advice.

2018/19 Performance Target	2019/20 Performance Target	2020/21 Performance Target	2021/22 Performance Target
82% of intake calls answered	70% of intake calls answered	72% of intake calls answered	72% of intake calls answered

In setting performance targets for the planning period, the impact of staffing adjustments that resulted from the loss of funding for the mediation program was a key consideration.

2. **Performance Measure:** Increased and quick access to justice for Ontarians and increased efficiency and capacity in the human rights system through early resolution of human rights cases, reducing costs for claimants, respondents and taxpayers.

2018/19 Performance Target	2019/20 Performance Target	2020/21 Performance Target	2021/22 Performance Target
70% of cases that reach mediation are resolved at the mediation stage	66% of cases that reach mediation are resolved at the mediation stage	66% of cases that reach mediation are resolved at the mediation stage	66% of cases that reach mediation are resolved at the mediation stage

The mediation settlement rates during restructuring periods will be depend on variables such as staffing levels.

3. **Performance Measure:** Increased and quicker access to justice for Ontarians and increased efficiency and capacity in the human rights system by resolving cases before a full hearing is held, reducing costs for claimants, respondents and taxpayers.

2018/19 Performance Target	2019/20 Performance Target	2020/21 Performance Target	2021/22 Performance Target
115 cases are settled between mediation and before or at a hearing	95 cases are settled between mediation and before or at a hearing	95 cases are settled between mediation and before or at a hearing	95 cases are settled between mediation and before or at a hearing

The number of hearing stage settlements during restructuring periods will depend on variables such as staffing levels.

4. **Performance Measure:** Increased and quicker access to justice for Ontarians and increased efficiency and capacity in the human rights system by resolving cases before a full hearing is held, reducing costs to claimants, respondents and taxpayers.

2018/19 Performance Target	2019/20 Performance Target	2020/21 Performance Target	2021/22 Performance Target
85% of hearing stage cases are settled at the beginning of a hearing	75% of hearing stage cases are settled at the beginning of a hearing	75% of hearing stage cases are settled at the beginning of a hearing	75% of hearing stage cases are settled at the beginning of a hearing

The settlement rates during restructuring periods will depend on variables such as staffing levels.

5. **Performance Measure:** High quality legal services are provided to Ontarians who have experienced discrimination.

2018/19 Performance Target	2019/20 Performance Target	2020/21 Performance Target	2021/22 Performance Target
At least 90% of clients rate the HRLSC services as good or very good.	At least 70% of clients rate the HRLSC services as good or very good.	At least 70% of clients rate the HRLSC services as good or very good.	At least 70% of clients rate the HRLSC services as good or very good.

6. Performance Measure: Ontarians are informed about discrimination, the human rights system and the HRLSC's services.

2018/19 Performance Target	2019/20 Performance Target	2020/21 Performance Target	2021/22 Performance Target
HRLSC achieves positive media coverage for at least 6 human rights stories arising out of HRLSC services	HRLSC achieves positive media coverage for at least 2 human rights stories arising out of HRLSC services	HRLSC achieves positive media coverage for at least 2 human rights stories arising out of HRLSC services	HRLSC achieves positive media coverage for at least 2 human rights stories arising out of HRLSC services

Date: October 17, 2018
 Provided by: Policy Division
 Ministry of the Attorney General