



EQUITY, DIVERSITY, INCLUSION & ANTI-RACISM

Real commitments. *Real accountability.*

How MindBank operationalizes equity in recruitment, content, and governance

A project and social enterprise of
ElevateHER Mental Health Support Services Canada

Version 1.0 · April 2026

HOW TO READ THIS DOCUMENT

Written *directly*.

This policy describes MindBank's commitments to equity, diversity, inclusion, and anti-racism — and how those commitments are operationalized in our recruitment, content, partnerships, and governance.

It is written directly because the communities most harmed by extractive lived-experience work do not need another performative policy. The test of this policy is not whether it sounds good. The test is whether the practices it describes are actually happening, six months and three years and ten years from now.

If you find a gap between what this policy says and what MindBank actually does, that gap is a serious matter. Contact the project lead at hello@mindbank.ca, or if the gap concerns the project lead's own conduct, the Ethics Council (when established) or your nearest lived-experience advisor.

01. Where MindBank starts

Honesty about the starting position is the foundation for any meaningful EDI commitment. So:

MindBank is a project led by a non-Indigenous, white woman, operating on Mi'kmaw territory in unceded Mi'kma'ki, building a platform that engages survivors of mental health, intimate partner violence, housing instability, and substance use challenges across Canada.

This starting position carries specific implications:

- The platform's structure, language, and assumptions reflect the worldview of its founder
- The communities most affected by mental health system failures — Indigenous, Black, racialized, 2SLGBTQ+, disabled, and rural communities — are not yet meaningfully co-designing this work
- Power, decision-making authority, and access to funding currently sit with someone outside many of these communities
- Good intentions are not a substitute for accountability to the communities the work claims to serve

This policy is the beginning of building accountability, not a claim that accountability has been achieved. Where commitments below describe future states, they are explicitly marked as such.

02. The principles behind every EDI decision

2.1 Centring is not the same as including

To "include" diverse voices in a project still designed by dominant-culture leadership is to perpetuate the dynamic this work claims to challenge. Real equity requires moving authority, not just adding seats. MindBank commits to progressively moving decision-making authority toward the communities the platform serves.

2.2 Intersectionality is a practice, not a checkbox

People hold multiple identities simultaneously, and the marginalizations they face compound. We do not "balance" representation across single-axis categories. We pay attention to how race, gender, sexuality, disability, class, geography, age, and lived experience interact in shaping who is heard and who isn't.

2.3 Discomfort is not the same as harm

Genuine EDI work creates discomfort for those who hold dominant-culture power, including the project lead. We do not let discomfort drive us toward soft-peddalling, defensiveness, or retreat from accountability. Discomfort is a sign that real change is happening.

2.4 Anti-racism is action, not identity

We do not call ourselves an "anti-racist organization" as a static identity. We commit to specific anti-racist practices, name when we fail to follow them, and report publicly on our progress. Whether we are an anti-racist organization is a question to be answered every year by the communities we serve, not by us.

2.5 Land acknowledgment requires more than words

We acknowledge that MindBank operates from unceded Mi'kma'ki. That acknowledgment is meaningless without specific commitments to Indigenous engagement, Indigenous data sovereignty, and concrete action toward reconciliation. Section 4 of this policy describes those specific commitments.

2.6 We will be wrong, and we will say so

We will make mistakes. When we do, we commit to naming them publicly, repairing where possible, and changing the practice that caused them. Hidden mistakes compound. Named mistakes are how organizations actually change.

03. Who is currently underrepresented, and what we will do about it

3.1 Communities historically underrepresented in lived-experience platforms

Based on existing literature and our own assessment, the following communities are systematically underrepresented in mental health and survivor-voice platforms:

- Indigenous peoples (First Nations, Inuit, Métis)
- Black Canadians, particularly Black women
- Other racialized communities (East Asian, South Asian, Arab, Latin American, mixed-race, and others)
- 2SLGBTQ+ people, especially trans and non-binary people
- People with disabilities, especially psychiatric and developmental disabilities
- People in rural and remote communities
- Men, in mental health contexts specifically
- Older adults
- People for whom English is not a first language
- People with experience of incarceration, particularly Indigenous and Black people
- People living in poverty

3.2 Specific commitments for the pilot phase (2026–2027)

During the pilot, MindBank commits to:

Demographic tracking

We track the demographic composition of our applicants, contributors, and declined applications. This tracking is internal and aggregate-only. Where representation is significantly out of balance with population proportions or with the communities most affected by the issues we cover, we name the gap publicly in our annual transparency report and identify concrete steps.

Outreach beyond the platform

Application via the website is one entry point. We commit to building outreach partnerships with:

- At least one Mi'kmaw-led or Indigenous-led organization, with a relationship structured by Indigenous protocols rather than ours
- At least one Black-led organization in the Maritimes
- At least one disability-led organization
- At least one 2SLGBTQ+-led organization
- At least one rural-serving organization

These partnerships are funded — partner organizations are paid for their introductions, advice, and time.

Content gaps named publicly

When our library underrepresents an experience or a community, we say so on our website. We do not pretend coverage is broader than it is.

Accommodations from the start

Editorial workflows accommodate:

- Multiple languages (initially English and French; expanding based on contributor need)
- Multiple formats (written, recorded, voice memo, prompted)
- Disability-related accommodations including longer timelines, screen reader compatibility, captioned video, plain-language alternatives, and others as identified
- Time zones across Canada
- Variable connectivity (low-bandwidth participation options)

Compensation parity

Contributors are paid the same rates regardless of demographic background or perceived "marketability" of their experience. The Compensation Policy, Section 4.3, makes this explicit.

3.3 Specific commitments for years two and three

By the end of the pilot phase, MindBank will:

- Publish a multi-year EDI plan with measurable targets for contributor diversity
- Establish a paid lived-experience advisory circle with intentional demographic diversity, with binding (not advisory) authority on specific decisions to be defined by the circle itself
- Conduct an external EDI audit by a reviewer with credibility in the communities we serve
- Have begun the work of moving project decision-making authority beyond a single project lead

By year three:

- Establish an Ethics Council with majority lived-experience and majority equity-deserving representation
- Have named an Indigenous advisor or Indigenous advisory partnership with binding decision-making authority on Indigenous-related matters
- Have demonstrated meaningful contributor diversity, with accountability for any persistent gaps

These are commitments, not aspirations. If we fail to meet them, we will name the failure publicly and explain why.

04. Indigenous engagement and reconciliation

This section is its own commitment within the broader EDI policy because Indigenous-Settler relations in Canada require specific protocols that pan-EDI frameworks routinely fail.

4.1 Acknowledging the territory

ElevateHER Mental Health Support Services Canada and MindBank operate from Truro, Nova Scotia, on unceded Mi'kmaw territory in Mi'kma'ki. The Mi'kmaq are the traditional and continuing custodians of this land. Their sovereignty was never extinguished, and the Treaties of Peace and Friendship signed in the 1700s remain in force.

This acknowledgment is not a ceremonial preamble. It is a recognition that everything MindBank does on this territory is conditioned by an unresolved relationship that requires specific attention and humility.

4.2 Specific Indigenous engagement commitments

Consultation before scope expansion

Before MindBank actively recruits Indigenous contributors, we will engage in formal consultation with at least one Mi'kmaw-led organization to discuss whether and how MindBank's structure can serve Indigenous communities respectfully. If the answer is "not yet" or "not in this form," we will accept that.

Indigenous data sovereignty

Where Indigenous individuals or communities choose to contribute, we will follow OCAP® principles (Ownership, Control, Access, Possession) of the First Nations Information Governance Centre, including:

- Indigenous contributors retain ownership of their contributed knowledge
- Indigenous contributors have control over how their content is used, by whom, and for what purposes
- Indigenous communities have access to their own contributed knowledge
- Possession of stored data on Canadian-region servers, with specific protections

These principles take precedence over MindBank's general intellectual property frameworks where they conflict.

Funding flow

Where Indigenous-related work generates revenue or benefit for MindBank, we commit to a transparent share returning to Indigenous-led organizations, by mutual agreement at the time of engagement.

No tokenism

We will not include Indigenous voices to make MindBank look diverse. We will not name Indigenous advisors in funder reports unless those advisors have meaningful, ongoing, paid engagement.

Refusing to extract

Indigenous knowledge that is communal, ceremonial, or sacred is not for the platform. We will not pursue contributions in those categories. We will follow the contributor's lead on what is and is not appropriate to share.

4.3 Where we are now

As of April 2026:

- Indigenous consultation is in our workplan but has not yet begun
- We do not yet have an Indigenous advisor or partnership
- No Indigenous content is yet in the library
- The platform's design has not yet been reviewed by Indigenous advisors

We are stating these gaps explicitly because pretending otherwise would be the opposite of what good Indigenous engagement requires. Closing these gaps is a Year 1 commitment.

05. Anti-racism in practice

5.1 What anti-racism means at MindBank

Anti-racism, for MindBank, means specifically:

Naming racism, not abstracting it

When something racist happens in our work — a contributor experiences racist treatment from staff, a piece of content reproduces racist framing, a partner organization shows racist patterns in their use of MindBank — we name it as racism, not as "an unfortunate incident" or "a misunderstanding."

Centring those most harmed

When white staff disagree with racialized contributors about whether something is racist, we default to the racialized contributor's assessment unless there is specific reason to do otherwise. The default position of dominant culture is that race is not the issue. We resist that default.

Examining our own systems

Editorial decisions, recruitment patterns, content review criteria, and partnership choices are examined for racial bias on a recurring basis, not just when an incident occurs.

Compensation, not comfort

Anti-racist practice generates discomfort for white staff, including the project lead. We do not let that discomfort drive us toward whitewashing, soft-peddling, or "both-sides" framing.

5.2 Specific anti-racism practices

Demographic tracking that surfaces patterns

We track:

- Application rates by self-identified race
- Pre-screening invitation rates by race
- Decline rates by race and the reason categories
- Publication rates by race
- Compensation distribution by race
- Subscriber demographic alignment with contributor demographic representation

When patterns emerge, we name them and act.

Editorial review for racial bias

Every piece of content goes through a review pass that specifically checks for:

- Racist framing or assumptions imported into editorial language
- Whitewashing of racialized contributors' experiences

- Universalizing racialized experiences as "human" experiences while specifying white experiences as "racial"
- Pathologizing patterns that appear in coverage of racialized communities

This review is conducted by someone with specific anti-racist editorial training, not by the project lead alone.

Partnership scrutiny

Subscribing organizations whose work demonstrably harms racialized communities are not eligible for subscription. This includes (but is not limited to):

- Organizations engaged in racial profiling
- Organizations whose programs disproportionately surveil or police racialized communities
- Organizations with documented patterns of racial discrimination
- Carceral institutions

Subscription applications are reviewed for these factors.

Internal accountability

When MindBank staff or contractors engage in racist behaviour, the response is proportionate to the conduct: education, mediation, removal from the role, or termination of the engagement. There is no tier of contribution to MindBank that exempts a person from accountability for racist conduct.

5.3 Limits of the project lead's perspective

The project lead is white. This means:

- The project lead does not see all forms of racism that affect MindBank's work
- The project lead has internalized racist assumptions she has worked to identify and is still identifying
- The project lead's "good intentions" do not constitute anti-racist practice
- The project lead's discomfort with being told something she said or did was racist is her work to do, not the work of the person calling her in

This policy exists in part to operationalize accountability beyond a single person's good intentions.

06. Subscriber expectations and review

6.1 Who can subscribe

Subscribing organizations must, at minimum:

- Be legally registered in Canada
- Operate in alignment with MindBank's values
- Sign the ethical use agreement
- Submit to vetting per the Operating Framework, Section 2.6
- Submit to ongoing accountability per the ethical use agreement

6.2 Who cannot subscribe

The following are not eligible for standard subscription, regardless of stated intent:

- Carceral institutions (prisons, immigration detention facilities, secure psychiatric facilities operating under involuntary commitment frameworks where the subscription would inform involuntary practice)
- Police services and police-adjacent organizations (subject to limited exceptions for specific anti-racism, mental health crisis response training initiatives, reviewed case-by-case)
- Organizations with documented patterns of racial discrimination
- Organizations whose work explicitly targets racialized, Indigenous, 2SLGBTQ+, disabled, or other equity-deserving communities for harm
- Researchers conducting work without separate research ethics approval
- Commercial entities seeking to use content for commercial purposes (commercial use requires renewed contributor consent and additional compensation)

These exclusions are not absolute. Edge cases are reviewed by the project lead in consultation with lived-experience advisors. Where the call is unclear, the default is "not eligible." Borderline subscribers can re-apply if circumstances change.

6.3 Subscriber EDI expectations

Subscribing organizations are expected to:

- Use MindBank content in ways that serve the communities the contributors come from
- Not extract the "diverse voices" content while ignoring the structural critique those voices contain
- Engage MindBank content as a complement to, not a replacement for, their own ongoing relationships with marginalized communities
- Pay their own lived-experience consultants and contributors fairly and not use MindBank as a way to avoid that obligation

07. Reporting and accountability

7.1 Annual EDI report

Each year, MindBank publishes a public EDI report covering:

- Demographic composition of applicants, pre-screened applicants, contributors, and declined applications (aggregate, with attention to small-cell suppression to protect individuals)
- Compensation distribution across demographic categories
- Subscriber composition and use patterns
- EDI commitments made the previous year and progress on each
- Specific failures, gaps, or concerns raised during the year and how they were addressed
- Plans for the coming year

The report is reviewed by the lived-experience advisory circle (when established) before publication. Their review is documented in the report.

7.2 How concerns are raised

Anyone — contributor, applicant, staff, contractor, subscriber, partner, member of the public — can raise an EDI concern by:

1. **Email to hello@mindbank.ca** (will be triaged by project lead)
2. **Email to a specific lived-experience advisor** (when the advisory circle is established, contact details published)
3. **Concerns about the project lead's own conduct** can be raised with any lived-experience advisor or, when established, the Ethics Council
4. **Anonymous concerns** can be submitted through a form on the website (when implemented)

All concerns are documented, investigated, and responded to in writing within 30 days. The response includes what was found, what was done, and how the matter was closed.

7.3 Independent review

Every two to three years, MindBank engages an external EDI reviewer with credibility in the communities we serve. The first review will be conducted in Year 2 of the pilot.

Findings from external reviews are published with our response, and acted on within 6 months unless we publicly explain why action will take longer.

7.4 When we get it wrong

When a specific failure is identified — through internal review, external review, contributor or partner feedback, or public criticism — MindBank commits to:

1. **Acknowledging the failure publicly** within a timeline appropriate to the severity (24 hours for major failures, 30 days for systemic patterns identified through analysis)

2. **Taking specific action** rather than issuing only a statement
3. **Repairing where possible** — including direct apology, return of material if appropriate, compensation if appropriate, and structural changes
4. **Reporting on what changed** in the next annual report

We do not promise we will never fail. We promise we will respond honestly when we do.

08. Limits of this policy

8.1 What this policy can and cannot do

This policy can:

- Articulate commitments
- Establish accountability mechanisms
- Provide a basis for evaluation
- Guide day-to-day practice

This policy cannot:

- Compensate for lack of diverse leadership
- Substitute for community relationships
- Make MindBank an "anti-racist organization" by its existence
- Prevent all harm — only commit to honest response when harm occurs

8.2 Where this policy must give way

If this policy ever conflicts with:

- **Community-led protocols** (e.g., Indigenous Nations' protocols on engagement with their members) — community protocols govern
- **Specific contributor preferences** — the contributor governs
- **Canadian human rights law** — the law governs (and exceeds, where the law is weaker than this policy)
- **The actual experience of the people most affected** — their experience governs over what we wrote here

If you find such a conflict, escalate. We will revise the policy to fix it.

09. Updating this policy

This policy is reviewed:

- **Annually** alongside the EDI report
- **Whenever an incident or concern reveals a gap** (within 30 days)

- **Whenever a community we engage with provides feedback** indicating revision is needed
- **At each major project transition** (end of pilot, scaling, governance changes)

Material updates to this policy are reviewed by the lived-experience advisory circle (when established) before adoption, and communicated publicly when adopted.

Change log

- April 2026 — Version 1.0: Initial policy. Reviewer: Stephanie Atwood, project lead. Next review with lived-experience advisory circle once established.

A NOTE FROM THE PROJECT LEAD

Plainly, *and honestly.*

I am writing this policy as a non-Indigenous, white woman, and I am aware that the credibility of every commitment in here depends on practices that haven't yet started.

The most honest thing I can say is that this policy describes what I am trying to build, with the help of people whose lived expertise and identities I do not share. When this policy is reviewed by a lived-experience advisory circle and revised by people who carry experiences this document refers to, it will become a stronger document. That revision is part of the plan.

If you are reading this from a community that has been failed by mental health work, by survivor-voice projects, or by organizations claiming "diverse and inclusive" practice without backing it up — your scepticism is reasonable, and earned. The work of making this policy real is mine to do. The work of judging whether I did it is yours.

— *Stephanie Atwood, Founder*