REPORT FOR ACTION

Data for Equity Strategy: Supporting Equitable Services, Equity Priorities, Performance Measurement and Accountability

**Date:** October 29, 2020

**To:** Executive Committee

**From:** Executive Director, Social Development, Finance and Administration, Chief People Officer, Chief Technology Officer and Director, Indigenous Affairs Office

**Wards:** All

**SUMMARY**

The purpose of this report is to describe and seek approval of the Data for Equity Strategy. The proposed strategy responds to several Council directions regarding disaggregated data\(^1\) from 2017 to 2020 and builds on the recent Toronto Public Health experience of collecting and analyzing socio-demographic data related to COVID-19 cases in Toronto. The Data for Equity Strategy will support City divisions to collect, analyze, report and apply disaggregated population and place-based data\(^2\) to inform program planning and service delivery in support of the City's equity and prosperity\(^3\) goals.

The Data for Equity Strategy includes a goal, objectives, guiding principles and guidelines on how City programs and services should collect, manage and share data that is broken down by socio-demographic groups such as Indigenous communities, racialized groups, gender identities, and neighbourhoods. It also proposes pilot projects and a phased implementation approach. The Strategy advises that socio-demographic data collection should be voluntary except where required for program eligibility. It is also consistent with the City's [Access to City Services for Undocumented Torontonians\(^4\)](https://www.toronto.ca/city-government/accountability-operations-customer-service/long-term-vision-plans-and-strategies/access-to-city-services-for-undocumented-torontonians/)

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\(^1\) Disaggregated data refers to large data sets that are broken down into smaller units. In this report and the Data for Equity Strategy, disaggregated data refers to data that is broken down and examined by socio-demographic groups such as Indigenous communities, gender identities, racialized groups and neighbourhoods.

\(^2\) Population-based data describes people's socio-demographic characteristics such as age, race, gender and disability. Place-based data identifies places people live, such as neighbourhoods.

\(^3\) In this report, prosperity refers to economic and social well-being, inclusion and self-determination for Indigenous people and communities in Toronto. This aligns with the Tkaronto Indigenous Prosperity Plan which is currently in development.

The Strategy will enable the provision of excellent service and advancement of equity and inclusion strategies by the City of Toronto by supporting the collection of socio-demographic data and use of disaggregated data to identify equity and prosperity goals, monitor progress, and assess impacts.

Section 8 of the City of Toronto Act, 2006 provides the City with a broad authority to provide necessary or desirable services or things to the public. The Data for Equity Strategy aligns with other City of Toronto equity initiatives and allows for a City program to collect, use, analyze and report socio-demographic and disaggregated data in an appropriate manner for the purposes of identifying and addressing inequities in City services for the public's benefit.

RECOMMENDATIONS

The Executive Director, Social Development, Finance and Administration, Chief People Officer, Chief Technology Officer and Director, Indigenous Affairs Office recommend that:

1. City Council approve the Data for Equity Strategy as outlined in Attachment 1, including authorizing the collection, use, sharing, analysis, and reporting of socio-demographic and disaggregated data in accordance with the Data for Equity Strategy as contained in Attachment 1 and the Data for Equity Guidelines contained in Attachment 7 to this report.

2. City Council express its support for establishing a Data for Equity Unit in 2021 and acknowledge the intention of the City Manager to request $314,252.84 gross and net for the establishment of a Data for Equity Unit with four permanent full-time staff positions within the People and Equity Division and $75,000 gross and net for Indigenous community consultations and program support, for a total of $389,252.84 gross and net in the City Manager's Office 2021 Budget Submission for consideration as part of the 2021 Operating Budget process.

3. City Council request the City Manager to submit funding applications, as appropriate, to federal and provincial governments, to non-profit organizations and to private sector organizations to support the establishment and work of the Data for Equity Unit, and authorize the City Manager to enter into such agreements in a form satisfactory to the City Manager and City Solicitor.

4. City Council direct the General Manager, Children's Services, Executive Director, Social Development, Finance and Administration, and General Manager, Toronto Employment and Social Services and request the Medical Officer of Health to, upon establishment of Data for Equity Unit in 2021, develop, implement and evaluate the Phase One pilot projects and provide relevant findings to be included in a progress report to the Executive Committee in Q1 of 2023.
5. City Council direct the Chief People Officer, People and Equity Division to make the Data for Equity Guidelines publicly available to help support shared equity priorities and promote consistent approaches across sectors, including community organizations.

6. City Council direct the Chief Technology Officer and City Clerk to include an update on the alignment of the Data for Equity Strategy with the Digital Infrastructure Plan, Open Data Master Plan, and Information Management Policies and Guidelines, in the Digital Infrastructure Plan progress report to Executive Committee in Q3 of 2021.

7. City Council direct the Chief People Officer to report to Executive Committee in Q1 of 2023 with key findings from Phase One of the Data for Equity Strategy including recommendations for implementation of Phase Two of the Strategy.

FINANCIAL IMPACT

There are no financial implications arising from this report in the 2020 Operating Budget.

The cost of developing a Data for Equity Unit within the People and Equity Division for 2021 is $389,252.84, which will be included in the 2021 Operating Budget of the Office of the City Manager, for consideration through the budget process against all other City priorities subject to approval of City Council.

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<thead>
<tr>
<th>DESCRIPTION:</th>
<th>COST:</th>
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<tr>
<td>Establish 4 permanent full-time positions</td>
<td>$314,252.84</td>
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The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial impact information.

EQUITY IMPACT STATEMENT

Indigenous\(^5\), Black and equity-seeking groups\(^6\) face systemic discrimination and barriers to income, housing, employment, education and services, and experience worse living

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\(^5\) For the purposes of this report and the Data for Equity Strategy, the term "Indigenous" is reflective of the many nations that exist within First Nations, Inuit and Métis communities.

\(^6\) Equity-seeking groups refer to communities that face significant collective challenges in participating in society because of barriers to equal access, opportunities and resources due to disadvantage and discrimination, and actively seek social justice and reparation.
conditions, health and wellbeing as a result. For example, in Toronto racialized groups have an average income that is about half (52.1%) of the average income of white people\(^7\), 87% of Indigenous adults live in poverty\(^8\), 83% of lone parent families are led by women and 40% of those families live in poverty\(^9\). The Data for Equity Strategy will provide City divisions with guidance to support the collection and use of data to identify, monitor and address inequities in City services. It is anticipated that the implementation of the strategy will reduce inequities by supporting City divisions to identify inequities, decrease barriers and improve City service access and impacts for Indigenous, Black and equity-seeking groups.

**DECISION HISTORY**

**EX12.2 - Digital Infrastructure Plan - Update**
On January 29, 2020, Toronto City Council adopted a guiding framework, including five Working Principles, for the City's Digital Infrastructure Plan. One of these principles – Equity and Inclusion – states that Digital Infrastructure will be used to create and sustain equity, inclusion, accessibility, and human rights in its operations and outcomes. In adopting this report, City Council directed the City Manager to ensure that any digital infrastructure proposal submitted to the City is in compliance with all five principles and directed staff to conduct consultation on issues related to children and data collection. [http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.EX12.2](http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.EX12.2)

**EX8.7- Creating a Gender Equity Strategy and Gender Equality Office for Toronto**
On October 2, 2019, Toronto City Council directed the Chief People Officer, People and Equity to develop a Gender Equity Strategy by the end of 2021 and establish a Gender Equity Unit within People and Equity. The collection and use of disaggregated gender data will be a priority of the Gender Equity Strategy. [http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.EX8.7](http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.EX8.7)

**EX22.2 - 2017 Capital and Operating Budgets**
On February 15 and 16, 2017, Toronto City Council requested, as part of the 2017 Capital and Operating Budget, for staff to develop a disaggregated data collection strategy that will assist in, among other things, assessing the gendered impacts of City budgetary and policy decisions and report back to the November 29, 2017 meeting of the Executive Committee on the strategy and implementation plan. [http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.EX22.2](http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.EX22.2)

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EX34.10 - Supporting Equity Goals with Disaggregated Data
On May 22, 2018 Toronto City Council approved a framework of equity and human rights, privacy and open government as the three key principles that will guide the use of disaggregated data at the City of Toronto. Council directed City staff to report to Council in 2019 with a strategy that adheres to these principles and supports City divisions to collect, analyze, report and use disaggregated population- and place-based data to inform equitable program planning and service delivery in support of the City's equity goals. Council also directed that this strategy should be in accordance with the City of Toronto Open Data Master Plan.
http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.EX34.10

EX31.2 - 2018 Capital and Operating Budgets
On February 12, 2018, Toronto City Council requested, as part of the 2018 Capital and Operating Budget, that the City Manager expedite the disaggregated data strategy and report to Executive Committee on the implementation plan.

EX29.11 - The Toronto Action Plan to Confront Anti-Black Racism
On December 5, 2017, City Council adopted The Toronto Action Plan to Confront Anti-Black Racism which outlined 80 actions and 22 recommendations for the City to undertake over five years with required resources funded. The Action Plan recommends several actions to promote, collect and use disaggregated race-based data to identify and address anti-Black racism.
http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.EX29.11

CD19.10 - Opportunities and Issues in Using Disaggregated Population Data
On April 26, 27 and 28, 2017, staff provided Council with a summary of the uses, benefits and limitations of disaggregated data. The report highlighted the potential use of disaggregated data as a tool to improve social equity in the delivery and assessment of the City of Toronto's services, programs and policies.

COMMENTS

The Data for Equity Strategy
The Data for Equity Strategy is presented in Attachment 1. It provides staff with the rationale, framework and guidelines to promote the consistent collection and use of reliable, comparable and actionable data for monitoring and addressing inequities.

The Strategy was developed through extensive research, review and consultation with key internal and external stakeholders including the City of Toronto's Indigenous Affairs Office and Confronting Anti-Black Racism Unit, an overview of which is provided in Attachment 5. It will be implemented in two phases, starting with a first phase from Q3 2021 to Q1 2023. A phased approach is recommended because socio-demographic

10 The Data for Equity Strategy is focused on City of Toronto service users and residents. It is consistent and aligned with efforts focused on the diversity and inclusion of the City’s employees.
data collection and disaggregated data use is complex, requires substantial time and resources, and is challenging to implement successfully and sustain. Care and consideration must be taken to ensure that the process of data collection, reporting and use does not create barriers to service, cause harm, perpetuate stereotypes or lead to public mistrust. Lessons learned in Phase One will inform the second phase of implementation.

The Data for Equity Strategy consists of:
- A goal and set of objectives
- Guiding principles outlining the City's responsibilities in implementing the strategy
- Guidelines (Attachment 7) for City divisions on how to collect socio-demographic data and how to manage and share disaggregated data in a consistent way
- An Implementation Plan for Phase One that includes pilot projects in existing programs to test and learn from the application of the guidelines in different program contexts
- Developing Phase Two of the Strategy, including revised guidelines and a second phase of implementation based on lessons learned in Phase One.

Actions to Develop the Data for Equity Strategy

The following actions were taken to help inform the development of the Data for Equity Strategy:
- A review of City of Toronto divisional activities and experiences was conducted, including a survey of City divisions on data collection and use in 2018-19, consultations with staff in 2018-20 and a review of divisional documents. This information is summarized in Attachment 3.
- A review of jurisdictions and experiences was conducted to identify and learn from existing socio-demographic data collection and disaggregated data strategies in municipalities, health and social services, and other public services in Canada, the United States and internationally. Key findings of this review, including insights into challenges and promising practices, are detailed in Attachment 4.
- City staff consulted with researchers, data and anti-racism experts, community organizations, advisory groups, community members, Black organizations and leaders, and Indigenous organizations, advisory groups and leaders. These consultations are summarized in Attachment 5.

Rationale and Background

The Data for Equity Strategy is needed because Toronto residents do not all have the same opportunities for participation, inclusion and wellbeing. Some groups of people face systemic discrimination and barriers to income, housing, employment, education and services, and experience worse outcomes as a result. For example, in recent months during the COVID-19 pandemic, Toronto Public Health data has shown that COVID-19 rates are higher for people living in low income households, Black people and racialized groups. The socio-economic effects of the COVID-19 response have also led to deeper inequities, challenges and barriers, including loss of jobs and wages, housing instability, food insecurity, mental health challenges, social isolation, lack of childcare and experiences of racism.
Data is an important tool for identifying, understanding, monitoring and addressing the living conditions, experiences, service access and impact of programs for people in Toronto. This data is essential for the City of Toronto to develop evidence-informed policies, strategies, services and processes that are relevant, impactful, responsive, transparent and accountable to Toronto residents. However, when data is considered and reported only for the city's population as a whole, that data can hide important differences in the needs and experiences of particular groups of people. This can result in City policies, programs and services that take a "one-size-fits-all" approach. Some City of Toronto programs and services do not adequately identify, consider and address the specific needs and barriers faced by diverse residents. As a result, some groups of Toronto residents are unable to access City services, do not have their needs met, or are not treated respectfully and appropriately.

The City of Toronto has recognized and made a commitment to Indigenous, Black and equity-seeking groups through initiatives and strategies that aim to address systemic discrimination, remove barriers, promote equity and achieve prosperity. To effectively plan, implement, monitor and evaluate these equity and prosperity activities, it is important to understand who is accessing City programs, who is achieving which outcomes and where they live. It is also important to identify who is not accessing City programs and if there are service barriers. Presently, the City's efforts to recover and rebuild from the impacts of COVID-19 and on policing reform have reinforced the need for race-based and other disaggregated data.

Currently, most City programs collect limited socio-demographic data and this is not done consistently across divisions. There is no central City-wide support to help divisions with research design, data collection methods, data analysis, program planning, monitoring, evaluation and applying equity-related findings into action. There is a need for an overarching strategy that provides staff with a supporting framework and concrete guidance for the collection, analysis and reporting of disaggregated data to assess, monitor and address inequities in services, while ensuring compliance with applicable legislation and adherence to best practices and standards. The Data for Equity Strategy will provide staff with a framework, guidelines and support to promote the consistent collection and use of reliable, comparable and actionable information for monitoring and addressing inequities.

**Limitations, Challenges and Risks**

There are important limitations, challenges and risks that come with the collection and use of socio-demographic and disaggregated data.

Socio-demographic data collection and disaggregated data use is complex and requires substantial time, resources, support for implementation and staff training. Known challenges and risks when integrating this work into programs and services include:
• Sensitivity with the type of data being collected from service users and the potential to cause discomfort for service users or service providers, create barriers, lead to bias in service provision and cause harm\textsuperscript{11}
• Privacy concerns related to collecting data, staff access to data and the need for safeguards against privacy breaches
• Barriers in information technology systems for storing, managing and reporting data
• Challenges with integrating data collection into existing work processes and aligning tools and systems
• Lack of acceptance, comfort or commitment to collect or use socio-demographic data
• Insufficient expertise, supports for implementation and ongoing resources dedicated to implementing, sustaining and improving data collection and use

All of these challenges can make data collection and use difficult to implement successfully and sustain over time. It can take substantial time and be difficult to achieve consistent collection and high data quality. The voluntary nature of data collection and different comfort levels of staff can also lead to poor data quality. If data quality is poor, staff willingness to collect the data is low, or capacity to use the data are limited, data may not be used to identify inequities and make changes. If the data does not get used, staff will not see the value of collecting it and residents will lose trust in the City.

Even with consistent, high quality data and capacity and resources to analyze the data and apply findings, there are limitations to the analysis that can be done and the information it can provide. When data for groups of people are small in numbers, this data is not very reliable and may not be reportable for privacy reasons. This limitation can prevent staff from reporting and analyzing data by socio-demographic groups that would be most appropriate, or using an intersectional approach that might provide the most insight. For example, a program may not have sufficient data numbers to break down its data by specific racial groups and may instead have to group together all racialized residents for its analysis. Similarly, a program may not have sufficient data to look at the intersection of race and gender in its analysis.

When strong data analysis is possible, it only tells part of the story. Breaking down program data by racial groups can help to identify differences in service access and impacts, but it does not provide comprehensive insight into what barriers exist, why there are barriers and how they can be addressed.

Therefore, there is a need to engage with residents, conduct additional analysis and research, and review existing program evidence to truly understand the issues and identify appropriate solutions. Community engagement is also important to ensure that public reporting and data sharing provide appropriate context and interpretation so that

\textsuperscript{11}This may include service user discomfort in providing sensitive information or concerns that if a service provider knows their race, gender, sexual orientation and other socio-demographic characteristics, the service provider might intentionally or unintentionally treat the service user differently or negatively, or this information may be used to deny services or take them away. This may create barriers to service access, and may also result in harm if this data does result in discriminatory treatment or exclusion from services on the basis of this information.
data reporting does not stigmatize specific communities but instead is supportive and reflective of their perspective.

**Recent Case Study: Toronto Public Health's COVID-19 Data Experience**

The recent Toronto Public Health experience of collecting race, Indigenous identity and income for COVID-19 cases and analyzing COVID-19 data by a range of socio-demographic factors provides a timely illustration of some of the potential benefits, challenges and limitations of socio-demographic and disaggregated data collection and use. Findings from this data have shown that there are higher rates of COVID-19 among low income people and many racialized groups, and that there is a high concentration of cases in some specific Toronto neighbourhoods. There has been a high level of public interest in this data and Toronto Public Health has engaged with affected communities to gain insights into why certain communities are at higher risk, what responses are needed, and how best to interpret and report this data in ways that are sensitive and supportive of affected communities rather than stigmatizing. This data has been used to identify neighbourhoods with high concentrations of cases and risk, to recommend locations for mobile and pop-up testing sites in higher-risk areas, and to suggest priority schools needing smaller class sizes to decrease risk.

The Toronto Public Health COVID-19 case data experience illustrates how socio-demographic data can be collected and used to identify and rapidly respond to emerging inequities. This experience demonstrated the need for adequate resources and supports for implementation and the importance of community engagement in the planning, implementation, analysis and use of data. It also highlights some important limitations in how disaggregated data can be used.

Limitations to the socio-demographic data for COVID-19 cases include missing or unusable income and race data, limited housing data, and inconsistent or incomplete occupation data\(^\text{12}\). Equity-related findings must be interpreted with caution due to the sizeable number of COVID-19 cases with missing socio-demographic data. Data quality challenges and small data numbers also limit the analysis that can be done to understand how factors like income, housing and occupation interact, which would provide a better understanding of who is at risk. Finally, even if data quality were improved and it was possible to do additional analysis of intersecting factors, these analyses can only provide part of the story. It is still necessary to engage with communities to understand why some communities are at higher risk and what response is needed.

While it is important to consider all of these limitations, the Toronto Public Health COVID-19 case data example highlights how collecting and using socio-demographic data has enabled Toronto Public Health to identify stark inequities and act quickly to address them.

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\(^{12}\) Some data on cases' occupations and contacts living in their households were already being collected as part of COVID-19 case and contact management before the addition of race, Indigenous identity and income.
Conclusion

While the limitations need to be carefully considered, the benefits of disaggregated data are significant. Without disaggregated data, the City is at risk of delivering ineffective services that do not reflect the needs of Toronto residents and lack accountability. The collection and use of socio-demographic and disaggregated data has great potential to improve services and promote positive outcomes for Toronto residents who need them most. However, disaggregated data alone is not going to solve the City’s inequities. It includes risks and limitations. Great care and consideration must be taken at all stages to ensure that data collection, reporting and use do not create barriers to service, cause harm, perpetuate stereotypes, stigmatize groups of people or lead to mistrust among residents and service users. Most importantly, it requires leadership and commitment to the ongoing use of disaggregated data for decision-making and action to reduce barriers and promote equity and prosperity for everyone.

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ATTACHMENTS

Attachment 1: The Data for Equity Strategy
Attachment 2: Key Terms and Definitions
Attachment 3: Overview of City of Toronto Divisions' Activities and Experiences
Attachment 4: Overview of Jurisdictions, Experiences and Lessons Learned
Attachment 5: Summary of Process and Consultations Informing Data for Equity
Attachment 6: Additional Legislative Context for Data for Equity
Attachment 7: Data for Equity Guidelines