

Data for Equity: Corporate Implementation

Date: July 2, 2025
To: Executive Committee
From: Chief People Officer
Wards: All

SUMMARY

This report responds to City Council's directive on November 25 and 26, 2020 ([2020.EX18.6](#)), to provide key findings from Phase One of the Data for Equity Strategy (see Attachment 1). It also responds to City Council's directive on October 9 and 10, 2024 ([2024.MM22.15](#)) to report back, as part of the Data for Equity Strategy in the second quarter of 2025, on how the City can best collect and appropriately use disaggregated workforce data to better understand the experiences of First Nations, Inuit and Métis, Black and equity-deserving staff and enable the delivery of more equitable and transparent human resource services throughout the employee journey.

Data for Equity Strategy

The goal of the Data for Equity Strategy is to provide staff with a standardized framework and guidelines for consistent collection and use of reliable, comparable and actionable data for monitoring and addressing inequities, and understanding impacts of programs and services across the organization. Phase One of the Data for Equity Strategy was intended to test and learn from the application of the Strategy within different City program and service contexts with a focus on six (6) key activities. These activities included:

- establishment of the Data for Equity Unit in the People & Equity Division;
- use of Data for Equity Guidelines (see Attachment 2) by City divisions;
- implementation of pilot projects;
- development of community governance models;
- development of corporate-wide resources; and
- activities related to key privacy, information management, and technology priorities.

Early implementation enabled important strides in increasing staff capacity, improving understanding of unique services users, and advancing better pathways to data-informed decision-making. It also highlighted some key opportunities to advance a more consistent standard of practice. Building on these findings, People & Equity will take steps to further integrate and coordinate data collection and stewardship at the City. This includes supporting divisions in building capacity and aligning with the Data for

Equity Guidelines when using socio-demographic data to inform programs, services, and employee journeys* in a way that improves outcomes for First Nations, Inuit and Métis*, Black*, and equity-deserving groups*.

There is a continued need to ensure ongoing compliance with the Guidelines and the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) that governs information management, while also continuing to drive a data-focused, equity-driven culture at the City that is grounded in responsible, community-informed and equitable practices.

As People & Equity takes the next steps to deepen and expand the implementation of the Data for Equity Strategy, measurement will remain a central pillar of this work. As a methodological framework, the Strategy will continue to support the organization to better understand and advance the equity impact of City services and programs. As implementation progresses, People & Equity will also assess the efficacy of the Strategy through key monitoring and evaluation tools.

Expand on the Collection of Equity Data on Employees

The “Diversity Data Collection & Reporting Modernization” capital project included in the 2025-2034 Capital Budget and Plan for Technology Services Division will enable the City to assess existing technology for the integration of socio-demographic data collection into human resource processes. This project aims to help assess current challenges and limitations within existing tools and processes, as well as help address emerging concerns that align with the City’s goal of enabling equitable human resources practices.

The initial planning phase of this capital project is underway. As part of this phase, People & Equity is assessing ways to leverage existing technology for the integration of socio-demographic data collection into human resources processes, reviewing legislative authority to collect and use data, business process improvements, and identifying data gaps. This could also include expanding current data collection methodologies and leveraging existing workforce and socio-demographic data to improve outcomes for First Nations, Inuit, and Métis, Black and equity-deserving staff throughout their employment journey.

A phased approach will enable the City to address Council’s direction by ensuring the City has the workforce data and capabilities to better understand the experiences of First Nations, Inuit and Métis, Black, and equity-deserving staff, and to deliver equitable and transparent human resource services to all City employees. This will also help ensure the City’s current processes and practices are aligned to support the outcomes of the capital project. People & Equity, in collaboration with Technology Services Division, will continue to update Council on the progress of this multi-year capital project through the quarterly variance reporting and the City’s annual Budget process.

RECOMMENDATIONS

* See Attachment 5 - Key Terms and Definitions

The Chief People Officer recommends that:

1. Executive Committee receive this report for information.

FINANCIAL IMPACT

This recommendation has no incremental financial impacts on the 2025 Operating Budgets, and 2025-2034 Capital Budget and Plan of the participating divisions. Any funding required for resources and/or any changes to processes or structures to implement the use of the Data for Equity Strategy and Guidelines will be accommodated within the 2025 Operating Budgets and the 10-year Capital Plan of the participating divisions.

The 2025-2034 Capital Budget and Plan for Technology Services Division includes funding to enable the technological capabilities to expand the collection and reporting of socio-demographic and workforce data in alignment with City-wide priorities. Any additional funding required for resources will be included in future Budget submissions for People & Equity and Technology Services Division's for Council consideration.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial implications as identified in the Financial Impact section.

EQUITY IMPACT STATEMENT

This report has been analyzed for potential impacts on First Nations, Inuit and Métis, Black, and equity-deserving groups. Evidence suggests First Nations, Inuit and Métis and Black communities have, and continue, to face harm due to the misuse of their data.

To ensure that root causes of inequities are being identified and that the unique experiences of the affected groups are understood, the City requires a cohesive approach to the collection and use of socio-demographic data by divisions in accordance with specific legislative authority. By supporting the coordinated application of the Data for Equity Guidelines in the process of collection, analysis, and use of First Nations, Inuit and Métis, Black, and equity-deserving community data, the systemic barriers and misconceptions about these communities can be dismantled, fundamental rights respected, and City services, as well as employee journeys, can become more responsive to the needs of these communities. The lack of a coordinated approach to the collection and handling of this data across City divisions leads to service disparities that further disadvantage these communities.

The coordinated use of the Data for Equity Guidelines aims to reduce inequities by developing City-wide data standards to identify those inequities, decrease barriers, and improve City service access and employee journeys for First Nations, Inuit and Métis, Black, and equity-deserving communities facing disproportionate barriers. Directing the

coordinated use of the Guidelines will have a positive equity impact as we continue to support City divisions in making data-driven decisions to advance the City's key priorities. Additionally, this will include leveraging the collection and use of disaggregate workforce and socio-demographic data to advance equitable outcomes for First Nations, Inuit and Métis, Black and equity-deserving staff throughout their employee journey.

DECISION HISTORY

At its meeting on October 9 and 10, 2024, City Council adopted a member's motion to expand the collection of equity data on employees. The motion requested the Chief People Officer, in consultation with the Chief Technology Officer, the City Solicitor and the City Clerk, to report as part of the Data for Equity Strategy in the second quarter of 2025 on how the City can best collect and appropriately use disaggregated workforce data to better understand the experiences of Indigenous, Black and equity-deserving staff and enable the delivery of more equitable and transparent human resource services throughout the employee journey.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.MM22.15>

At its meeting on April 6 and 7, 2022, City Council unanimously adopted the City of Toronto's first Reconciliation Action Plan. The Plan will guide the City's actions from 2022 to 2032 to advance truth, justice, and reconciliation, and builds on the City's existing commitments to Indigenous Peoples through 28 meaningful actions across five themes: actions to restore truth, actions to right relations and share power, actions for justice, actions to make financial reparations and actions for the City's Indigenous Affairs Office.

<https://secure.toronto.ca/council/agenda-item.do?item=2022.EX31.1>

At its meeting on November 25 and 26, 2020, City Council adopted the Data for Equity Strategy without amendments, including authorizing the collection, use, sharing, analysis, and reporting of socio-demographic and disaggregated data in accordance with the Data for Equity Strategy. 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 First Nations, Inuit and Métis, communities, racialized groups, gender identities, and neighbourhoods. It also includes pilot projects and a phased implementation approach. The Strategy advises that socio-demographic data collection should be voluntary except where required for program eligibility.

<https://secure.toronto.ca/council/agenda-item.do?item=2020.EX18.6>

At its meeting on January 29, 2020, City Council adopted the City's Digital Infrastructure Strategic Framework (DISF) as the guiding direction for Digital Infrastructure Initiatives undertaken by the City. The definition of Digital Infrastructure includes all data collected or used by technology assets. One of DISF 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 that the DISF be used as the guiding direction for Digital

Infrastructure initiatives undertaken by the City.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.EX12.2>

At its meeting on December 5, 6, 7 and 8, 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 to address five issue areas: children and youth development; health and community services; job and income supports; policing and the justice system; and community engagement and Black leadership (with the 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 across these thematic areas.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.EX29.11>

COMMENTS

Progress Update on the Data for Equity Strategy

Background

The Data for Equity Strategy and Guidelines were developed by an interdivisional working group consisting of staff with equity and data expertise including representatives from Social Development (formerly Social Development, Finance & Administration), People & Equity, Indigenous Affairs Office and Confronting Anti-Black Racism Unit. The Strategy and Guidelines were informed by a jurisdictional scan, a review of existing tools, and extensive consultation with City staff, experts and community members.

Approved by City Council in November 2020, the Data for Equity Strategy 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 established to address the fact that First Nations, Inuit and Métis, Black and other equity-deserving groups face systemic discrimination and barriers in obtaining income, housing, employment, education and other services, and experience worse outcomes as a result. Data is important in driving and informing inclusive program planning, policy development, service delivery, public consultation and engagement, as well as employee journeys.

While many City divisions already use available population-level data* sets and socio-demographic information, collection, use, sharing, analysis, and reporting of such data has been inconsistent. As a result, there was a need to strengthen the overall corporate approach that provides divisions and their staff with a supporting framework and concrete guidance for the collection, analysis, and reporting of socio-demographic information while ensuring compliance with all applicable legislation. The Data for Equity Strategy was implemented in phases because the stewardship of socio-demographic and disaggregated data is complex and evolving, while requiring substantial time and

* See Attachment 5 - Key Terms and Definitions

resources, and is challenging to sustain successfully. The goal of Phase One was to test and learn from the application of the Strategy in different City programs and service contexts, with a focus on six key priority areas.

Progress Update on Key Priority Areas

As recommended in the [2020 Report for Action \(2020EX18.6\)](#), City Council directed the Chief People Officer to report back to Executive Committee with key findings from Phase One of the Data for Equity Strategy, which are detailed below.

1. The Establishment of the Data for Equity Unit: In January 2022, the Data for Equity Unit was established within the People & Equity Division to lead the implementation of the Data for Equity Strategy. The Unit provides internal consulting services to City divisions on the use and application of the Data for Equity Guidelines, including advising to enhance service equity, providing training, and establishing approaches to community consultation and guidance.

2. Use of Data for Equity Guidelines: The Data for Equity Guidelines were developed in 2020 as part of the Data for Equity Strategy to guide City of Toronto divisions on why, when and how to collect and manage socio-demographic data consistently. The Guidelines also provide advice on sharing and reporting on data that is broken down by socio-demographic groups for equity purposes. Using the lessons learned from the early implementation of the Data for Equity Strategy and recognizing that the City's equity priorities are continuously evolving, updates will be made to the Guidelines. This includes changes to the approach to asking gender and sexual orientation questions.

3. Pilot Projects: People & Equity worked with four pilot projects in existing programs that were collecting socio-demographic data to test and learn from the application of the Strategy. The pilot projects aligned their socio-demographic questions to reflect the Guidelines to use disaggregated data to inform programs and services that support the City's equity and prosperity goals.

Pilot projects were a key component of Phase One of the Data for Equity Strategy and included:

- Toronto Public Health: COVID-19 Case and Contact Management System.
- Toronto Children's Services: EarlyON Centres.
- Toronto Employment and Social Services: Ontario Works.
- Social Development's Community Funding Unit (CFU), United Way of Greater Toronto, and Toronto Central Local Health Integration: Funded Community Organization Pilot.

The pilot projects served as an important demonstration of how the Data for Equity Strategy can be integrated into City processes. These initiatives provided valuable insights into the practical application of the Strategy and contributed to advancing equity and reconciliation across participating divisions. Key achievements included divisions developing a deeper understanding of service users and Toronto's diverse residents; more informed decision-making, as divisions used socio-demographic data to tailor programs and services, leading to improved equity outcomes; and strengthened staff

capacity through targeted training and ongoing support from People & Equity, enhancing their ability to collect, analyze, and apply socio-demographic data effectively.

The evaluation of the pilot projects also identified several important lessons to guide future implementation. Resource constraints and operational demands often limited divisions' ability to fully sustain implementation efforts. The pilot projects further revealed inconsistencies in end-to-end data practices across the organization, highlighting the need for a standardized approach to ensure alignment with the Data for Equity Guidelines and MFIPPA. Finally, the pilots emphasized the critical importance of building trust with communities and developing ethical, community-led data governance models. Strengthening these relationships is essential to support meaningful participation, ensure responsible data stewardship, and advance long-term equity outcomes.

See Attachment 3 for additional information about key successes, equity and reconciliation impacts, as well as the lessons learned from the pilot projects.

4. Development of Community Governance Models: To ensure that the City's collection and use of socio-demographic data is accountable, transparent, and responsive to diverse community needs, community involvement and advice are critical components of the Data for Equity Strategy. First Nations, Inuit, and Métis, and Black communities have highlighted the need for community governance models to ensure that collected data is shared with, and used to benefit their communities, while ensuring protection of privacy. In response, People & Equity is working with communities to co-create a First Nations, Inuit, and Métis Data Governance Strategic Framework, as well as a Black Data Governance Framework.

See Attachment 4 for additional information about the development of the First Nations, Inuit, and Métis Data Governance Strategic Framework, and the Black Data Governance Framework, including a full list of partners and stakeholders engaged.

5. Development of Corporate-Wide Resources: People & Equity continues to develop new corporate-wide resources, tools, and education to support the collection of socio-demographic data and analysis and use of disaggregated data such as:

- The Data for Equity Community of Practice (COP) was established in 2021 to bring together the Phase One Pilot leads to offer support and learning opportunities.
- The facilitation of staff presentations and provision of resources to accompany the Data for Equity Guidelines.
- The development of an online Data for Equity training module.
- The development of the gender and 2SLGBTQ+ data collection training program as a response to City staff and community recommendations for capacity building support in this area. This project has been made possible by the City of Toronto's partnership with Toronto Metropolitan University and federal funding from Women and Gender Equity Canada.

6. Activities Related to Key Privacy, Information Management, and Technology Priorities: Data for Equity guidance continues to be incorporated into ongoing City

activities in the areas of privacy, information management and technology to help ensure widespread use of and support for the Guidelines through existing City processes. These collaborative activities include:

- Partnership with the Corporate Information Management Services Policy Unit on various policy initiatives, including the [Information & Data Governance Policy](#), the [Information Management Accountability Policy](#), and the [Protection of Privacy Policy](#).
- The Digital Infrastructure Strategic Framework (DISF) initiatives that support the Data for Equity Strategy:
 - i) Formation of a Digital Equity Guide (Technology Services Division, 2024).
 - ii) New requirement of business cases submitted through the capital project cycle to demonstrate alignment with the DISF, including the Equity and Inclusion principle where appropriate.
 - iii) The development of data governance mechanisms that protect the dignity and human rights of First Nations, Inuit and Métis, Black, and equity-deserving communities.

Next Steps for Advancing Data for Equity

To advance better equity outcomes for residents of Toronto and City staff, it is important to recognize that data practices can perpetuate biases, and the impacts of inequitable data practices can create significant harm. The use of biased data and inequitable data practices can potentially create service barriers, perpetuate stereotypes, and stigmatize groups of people, or lead to mistrust among residents and employees. Enabling better practices will lead to improved decision-making for all Toronto residents and City employees, but particularly for First Nations, Inuit and Métis, Black, and other equity-deserving groups.

Staff have analyzed the experiences and information collected from the early implementation of the Strategy, including the pilot projects, other divisional activities, and discussions with various stakeholders, to identify implications and lessons learned for applying Data for Equity Guidelines more consistently across the Corporation. A central insight from this work is the opportunity to align all program areas to a standardized and coordinated approach, ensuring the effective implementation of the Strategy across the City. To support this standardization and build on the six foundational activities identified above, People & Equity will prioritize the following initiatives to advance the City's commitments to First Nations, Inuit and Métis, Black and other equity-deserving groups:

1. Capacity Building Activities: City divisions currently vary in information and data governance maturity, and while many programs collect, analyze, and use socio-demographic data, it is often limited in scope and quality, not collected across all divisional programs, and not coordinated with other City divisions or the Data for Equity Guidelines. This approach results in ad hoc efforts and a lack of oversight, leaving the City vulnerable to compliance and regulatory risks.

As seen in the early implementation of the Data for Equity Strategy, capacity building continues to be a priority for staff in People & Equity, who will continue to support divisions in developing the necessary skills and knowledge to collect, store, use, and

govern socio-demographic data in a manner that is consistent with the Data for Equity Guidelines. Ongoing activities include the development and roll-out of various training and learning programs, such as online modules and a data collection toolkit.

2. Consultations with City Divisions: People & Equity will continue to engage with divisions to identify opportunities that support the application of the Data for Equity Guidelines, as well as aligning with other City of Toronto's corporate priorities, policies, programs, and shared outcomes. This includes:

- Engagement with existing Data for Equity program partners and the Data for Equity Community of Practice.
- Engagement with program partners and subject-matter-experts to receive input when updating the Data for Equity Guidelines.
- Further collaboration with Toronto Open Data, to ensure the principles of the Data for Equity Strategy are reflected in the City's refreshed Open Data Policy (forthcoming in 2025).
- Identification of opportunities to support the implementation of the Data for Equity Strategy by publishing data on the City's Open Data Portal.

3. Engagement with Public and Other Partners: To ensure data collection, analysis and use at the City is accountable, transparent, and responsive to diverse community needs, public involvement and advice is critical. Engagement and investment in fostering long-term relationships with First Nations, Inuit, and Métis communities and organizations will remain a priority. People & Equity will continue to seek feedback from communities to co-create various initiatives, including First Nations, Inuit, and Métis Data Governance Strategic Framework and the Black Data Governance Framework.

While these frameworks are in development, there is opportunity to create awareness of existing frameworks developed by communities, including the United Nations Declaration of Indigenous Rights Peoples (UNDRIP)¹ and Ownership, Access, Control, and Possession Principles (OCAP)² on data collection process(es)³ involving First Nations, Inuit and Métis peoples, communities, organizations, and Nations. Additionally, consideration should be given to the Engagement, Governance, Access, and Protection (EGAP) Framework⁴ and implications of the Second International Decade for People of African Descent when working to dismantle systemic racism, advocating for meaningful participation of people of African descent in decision-making processes and for data collection disaggregated by race and ethnicity to inform policies⁵.

4. Further Guidance to City Divisions: People & Equity is working to further coordinate the use of the Data for Equity Guidelines among divisions with the established legal authority to collect, use, share, analyze, and report socio-demographic

¹ https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf

² <https://fnigc.ca/ocap-training/>

³ Includes the creation, storage, management, usage, sharing, dissemination, archiving, and destruction

⁴ <https://blackhealthequity.ca/#resources>

⁵ <https://www.ohchr.org/en/stories/2024/12/second-international-decade-people-african-descent-renews-call-recognition-justice>

* See Attachment 5 - Key Terms and Definitions

and disaggregated data. Staff are working towards a more rigorous approach that will support divisions in collecting and using socio-demographic data to inform services and programs responsibly and proactively. This will allow for better data, consistency, and advancement of equity across the project, service delivery, and employment journeys.

Collaborating with the City Clerk's Office's Corporate Information Management Services Office, and Legal, People & Equity is developing the Data for Equity Policy, which will further operationalize and support alignment with the Data for Equity Strategy and Guidelines. The Policy will enable and support divisions in the end-to-end process of collecting and using socio-demographic data to inform services and employee journeys in a way that is appropriate, sensitive, and reflective of the experiences of First Nations, Inuit and Métis, Black, and equity-deserving groups.

In addition, the forthcoming Data for Equity Policy will:

- Provide end-to-end direction on why, when, and how to collect, store, use, and govern socio-demographic data (i.e. legislative authority, governance, oversight, strategic planning, monitoring and reporting).
- Provide additional safeguards for collecting and using socio-demographic data, based on learnings from early implementation of Data for Equity.
- Outline roles and responsibilities for City of Toronto divisions, including City Clerk's Office's Corporate Information Management Services Office, and Legal Services.
- Outline roles and responsibilities of the People & Equity Division.

As a core foundation of the work, each of these priority areas will be monitored and evaluated to assess compliance, identify opportunities for improvement, and reinforce accountability. Advancing the implementation of the Strategy will require continued collaboration with divisional partners, who remain key drivers of data collection efforts. In parallel, People & Equity will lead the development of a more robust enabling infrastructure, supported by strong governance and aligned with the Strategy's equity-focused objectives.

Update on Collecting Equity Data for Employees

People & Equity collects socio-demographic data and workforce data at different points along an employee's career journey in the Toronto Public Service. However, each data collection point is created independently over time and as a result there is a lack of data integration. The Diversity Data Collection & Reporting Modernization project will support the City in defining requirements for enabling enterprise solution capabilities to collect and report on disaggregated socio-demographic data related to its workforce.

People & Equity is currently assessing ways to leverage existing socio-demographic and workforce data collection and reporting methodologies, as well as employee insights to expand our understanding of the employee journey and leverage socio-demographic data to advance equitable outcomes for First Nations, Inuit and Métis, Black and equity-deserving employees throughout their employee journey (e.g., recruitment, onboarding and exit).

People & Equity is also assessing current data availability, data gaps and mapping how this could be integrated and automated through a technology solution. Privacy impact assessments may be conducted to ensure that data collection and reporting methodologies align with privacy legislation, human rights protections and applicable City policies and frameworks.

The project will enable the collection and appropriate use of disaggregated workforce data to better understand the experiences of First Nations, Inuit and Métis, Black and equity-deserving staff. This will also enable the delivery of more equitable and transparent human resource services throughout the employee journey. This ensures that every employee, at every level, experiences equitable conditions that enable them to thrive.

Digital Infrastructure Impact Statement

The Data for Equity Strategy aligns with the Digital Infrastructure Strategic Framework (DISF), including the following strategic priorities:

- **Digital Inclusion and Human Rights:** The Data for Equity Strategy advances this priority by helping to identify and remove systemic barriers to the full participation of diverse communities in the digital realm.
- **Data Governance:** The Data for Equity Strategy advances this priority through the development of governance frameworks, policy, and other resources that are part of the larger information and data governance landscape at the City, helping to ensure City data is used ethically, is collected in accordance with specific legislative authority, is managed responsibly through its lifecycle (including retention and disposition), and prevents misuse, abuse, or malicious practices.
- **Consultation and Participation:** The Data for Equity Strategy advances this priority by supporting the collection and use of public consultation data to ensure a diverse range of Torontonians are involved in the design, development, and evaluation of the City's Digital Infrastructure Initiatives.

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SIGNATURE

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ATTACHMENTS

- Attachment 1: Data for Equity Strategy
- Attachment 2: Data for Equity Guidelines
- Attachment 3: Detailed Learnings from Phase One Pilot Projects
- Attachment 4: Community Governance Models
- Attachment 5: Key Terms and Glossary