

# City of Toronto Black Community Data Governance Framework

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November 2023

Wellesley Institute advances population health and reduces health inequities by driving change on the social determinants of health through applied research, effective policy solutions, knowledge mobilization, and innovation.

The Black Health Alliance is a community-led organization working to improve the health and well-being of Black communities in Canada. Using research, community engagement, and health promotion, the Black Health Alliance acts as a platform to dismantle systemic barriers.

## **Project team**

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## **Acknowledgments**

We would like to acknowledge the members of the Black Data Advisory Circle and the participants of the focus groups who provided rich and honest perspectives necessary to develop this groundbreaking Black community data governance framework for the City of Toronto.

## **Funding**

This initiative was made possible through funding from the City of Toronto.



Report

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# Introduction

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**“This framework is driven by the imperative to establish trust with Black communities through genuine engagement.”**

The City of Toronto approved the Data for Equity Strategy to track disaggregated race-based data and gain a deeper understanding of the experiences of marginalized populations. As part of this strategy, there was an acknowledgment of the increasing expectation that communities should be actively engaged in

management of their data. To address this the City funded an Indigenous data governance initiative and the City of Toronto commissioned Wellesley Institute and the Black Health Alliance to develop a community governance framework for City data holdings. The initial community data governance framework has a specific focus on Black communities as a model for other racialized groups.

Collaborating with communities to ensure their voices are heard in the collection and utilization of their data yields several desirable outcomes, including:

- Building the City’s capacity to use sociodemographic data for positive change.
- Strengthening trust between communities and the City, fostering a better understanding of the City’s operations.
- Enhancing the quality of collected data.
- Identifying important areas related to fairness, potential harm or benefit that might have been overlooked otherwise.
- Ensuring that the data is used appropriately to improve services and supports for structurally marginalized groups.

In the current climate of heightened concerns about data collection and usage, community governance serves as a vital protection for those who are concerned. It offers a powerful mechanism to promote change and demonstrate the City’s interest in developing a model applicable across diverse data holdings has been positively welcomed by Black communities.

This report presents a framework for community data governance, derived from a comprehensive review of published and grey literature, consultation with City divisions and engagement with Black communities and experts in community data.

## Method

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The development of this framework relied on four activities:

- A literature review was undertaken to identify local, Canadian and international examples of data governance models and policies by relevant stakeholders.
- An internal scan, consisting of 12 meetings with six different City divisions and teams, was undertaken to identify the existing data structures and processes within the City.
- An advisory group was set up, known as the “Black Data Advisory Circle.” It included community experts, leaders and representatives with demonstrated experience in the fields of race-based data, data governance and digital technology. The primary role of this circle was to provide guidance throughout community engagement and framework development.
- A total of eight focus groups were conducted with participation from 31 individuals. These included local and regional representatives from Black organizations with experience in data governance, experts in anti-racism, data and technology, policy, law, and social justice, and members of Black communities in Toronto. The results of these focus groups were analyzed to strengthen the prototype Black community data governance framework which had been built from the literature review and feedback from the advisory circle.

# Black community data governance framework

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## Structure of the framework

The Black community data governance framework has been developed to offer the City of Toronto guidance on how to strategize effectively for the use of race-based data to deliver positive change for communities in Toronto (Figure 1).

The framework outlines a process by which Black populations in Toronto could be better engaged in the collection, use, and governance of City data holdings. Collaboration between Black communities and the City of Toronto will improve the use of data to improve equity and positive results, such as health, social, economic and environmental outcomes. This will help City services to be designed and delivered equitably.

The framework consists of key components: principles, objectives, areas of emphasis and outcomes.

Principles were established as guiding values to support the ongoing development and implementation of Black community data governance at the City of Toronto, aligning with the perspectives and priorities of Black communities:

- Data used for progress
- Accountability
- Transparency

Objectives and areas of emphasis were identified as strategic priority areas for the successful implementation of Black community data governance in the City of Toronto.

**Objective I:** City empowers community governance for decision-making.

**Objective II:** City builds a data ecosystem to track equitable outcomes.

**Objective III:** City harnesses community data to drive action.

The framework includes an outcomes section, which provides perspectives on the important outcomes desired as a result of this framework:

- Build trust with Black communities through engagement.
- Centre Black voices in decision-making on data.
- Data is used for the good of Black communities.

Following the framework, this report concludes by presenting considerations for the City of Toronto as they continue to implement various activities related to Black community data governance.

# City of Toronto Black Community Data Governance Framework

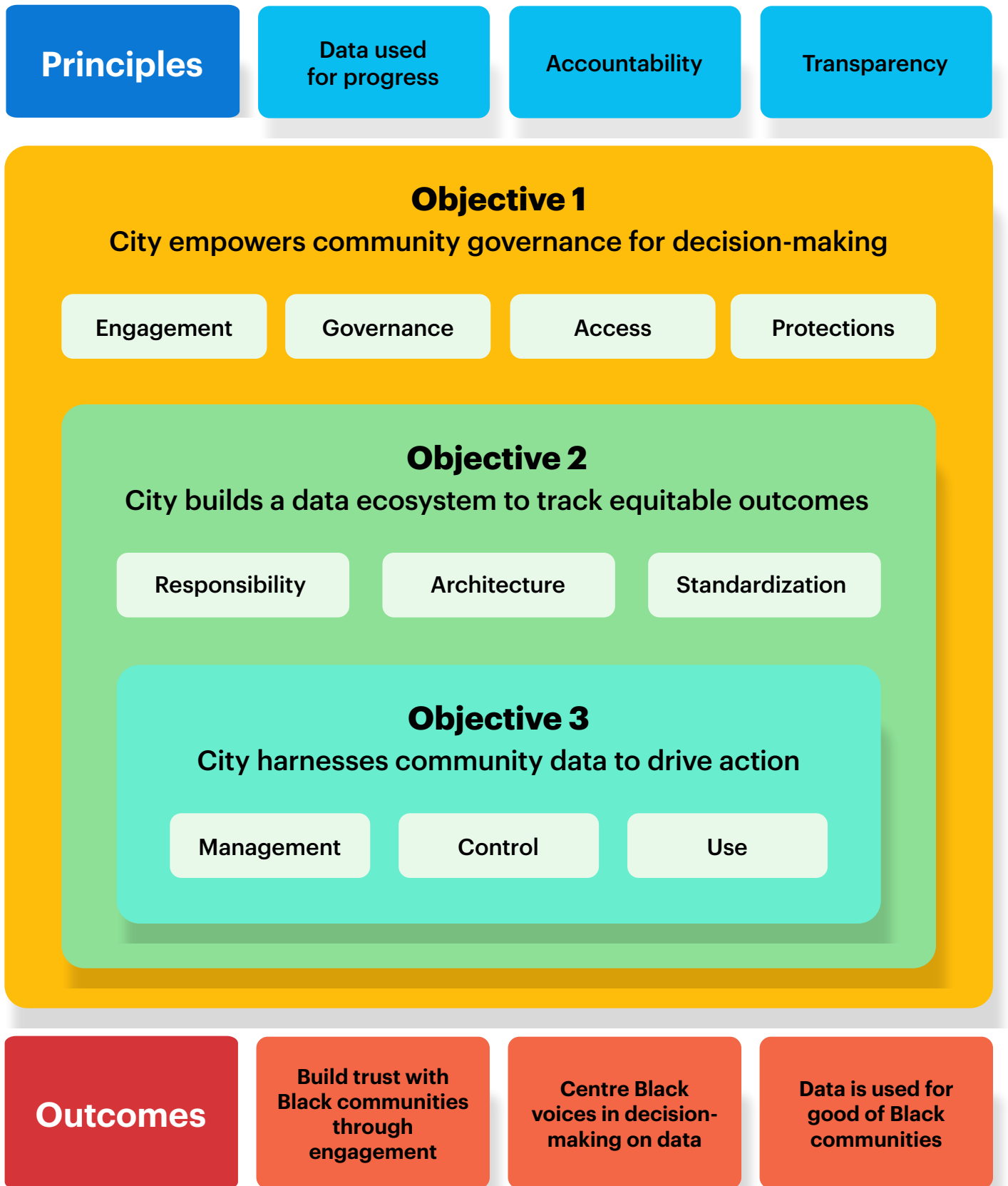


Figure 1 Black Community Data Governance Framework follows three guiding principles, through three general objectives. Each objective contains three to four emphasis areas crucial for success. The framework concludes with three outcomes, envisioned to result from successful implementation.

## Fundamental principles

The success of the community data governance framework relies on three fundamental principles, which emerged from the literature review and were confirmed through the process of community engagement. Participants stressed the importance of focusing on

data use for progress, accountability and transparency as crucial elements to guide actions and decision-making, aiming to build trust with Black communities.

**"It is crucial for the City of Toronto to be perceived as a trusted, responsible and accountable entity in order for Black communities to willingly provide race-based data."**

- **Data used for progress:** A community governance framework without a central focus on improving outcomes for Black populations is prone to failure. Progress in advancing equity through the utilization of race-based data should be the cornerstone for Black community data governance initiatives. While acknowledging the significant concerns about potential harm arising from the misinterpretation, exploitation and commercialization of this data, it is crucial to have a clearly stated aim of positive change for communities and the services they receive. The focus on progress encourages participation in community governance and ensures that the overarching aim of the collection and use of socio-demographic data is clear to City divisions. Ultimately, this principle forms an underlying covenant between City data holders and the community. Progress also involves the City's systematic use of data to measure, monitor and uphold equity in service delivery.
- **Accountability:** Accountability was deemed as important as progress by Black communities. They seek to have their voice reflected in the planning, design and implementation of community governance. They also expressed a need for robust accountability demonstrating the City's commitment to protecting and meaningfully using Black community data. In contrast to traditional data custodianship focused on legislative and regulatory compliance, accountability for race-based data extends attention to the perspectives, needs and approaches of Black communities.
- **Transparency:** Transparency acts as a catalyst by showcasing the City's accountability to foster trust with communities. Community members and organizations value being fully informed about the City's objectives and goals before sharing race-based data. Regular and clear communication about the use of data and how data use translates into tangible actions is essential. Providing clarity on race-based data's relevance to the City's services, programs and funding also helps communities understand the significance of their engagement in its governance.

## Objectives and areas of emphasis

The establishment of effective Black community data governance in the City necessitates three components. Firstly, there must be a clear mechanism facilitating the involvement of Black communities in decision-making processes related to data collection and utilization. This role is fulfilled by the creation of a community governance table for the City of Toronto. However, sustained engagement from Black



populations hinges on a clear outcome of their participation. A data governance framework must therefore serve a broader purpose, as perceived by the community, which includes enhancing the lives of the Black population, improving equity in City services and fostering accountability through transparency.

These objectives give rise to the second and third components: the City requires a data governance ecosystem capable of ethically generating high-quality data for equity, and it needs structures that both encourage and enable data use while ensuring the protection of communities in accordance with the guidance of the community governance table.

## **Objective I: City empowers community governance for decision-making**

Starting with community data governance can enable alignment with Black communities' priorities, values and needs in the City's development of an equitable data environment and responsive practices. This emphasis on community empowerment aims to foster accountability in the City's decision-making processes. This project identified several community governance initiatives, which were centred on a form of community governance table or group. For a complex and large institution like the City, the establishment of this Black community data governance table should facilitate centralized guidance for all City teams, divisions and partners.

Our suggestion is for the City to use the Engagement, Governance, Access and Protections (EGAP) framework, recognized as an effective Black community data governance model in Ontario. EGAP, which has received endorsements from data and policy leaders as well as Black communities, includes a community governance table. It continues to assert the importance of engagement, ensuring data accessibility, and implementing proper community data protections. Given its widespread recognition, adapting EGAP to guide the City of Toronto's Black community data governance process will promote alignment within community governance contexts in other sectors and at other levels of government and administration.

### **Emphasis: Engagement**

Partnerships with Black leaders and organizational stakeholders can strengthen the City's awareness and responsiveness to systemic problems affecting Black communities. Direct engagement with Black communities led by the City of Toronto can cultivate direct connections with these communities and broaden the City's outreach to encompass the wide spectrum of Black communities. In understanding the needs and perspectives of communities through engagement concerning race-based data, the City can garner and secure support for community governance.

Engagement is seen as an ongoing process rather than a one-time event. It entails a cyclical, long-term commitment by the City and those who hold data in the City to work with and alongside Black

communities. Engagement also serves as a platform for the City to communicate about its data holdings and initiate discussions on the purpose of a governance table. These dialogues enable the City to gain a deeper understanding of the needs of Black communities and facilitate the co-development of the governance table. This approach empowers communities from the outset.

### Emphasis: Governance

The establishment of a community governance table is crucial for translating discussions from engagement activities into actual changes to the management of race-based data. The composition, abilities and functions of this table would be determined through dialogue with Black communities. This serves to facilitate co-development and accountability mechanisms necessary for creating a secure environment for the data.

This table would provide guidance on the collection and use of data related to the Black community, facilitate access to data and serve as a resource for those holding data. It should strike a balance between being a functional group and ensuring that the diverse nature of the Black population is adequately reflected. Membership access to the table should be open, fair and transparent. The exact composition of the group will depend on how Black community data governance is implemented, whether it involves a central data governance table for the entire City or different divisions having their own tables.

### Emphasis: Access

Access to data goes beyond making data available; it entails providing the means for communities to effectively utilize it. Strengthening the data capacities and literacy within Black communities and organizations can empower community members to gain a meaningful understanding of, actively participate in, and form informed opinions on analysing and using the data.

### Emphasis: Protections

Communities are concerned about the safety and privacy of their collective data, especially in the absence of dedicated safeguards for community data. Prioritizing the development of protections specifically for race-based data is important to uphold its ethical, technical and equitable integrity. Collaboration between the City and the community governance table allows for the identification of specific concerns and the creation of potential solutions to mitigate the data's potential for harm. Obtaining initial agreement from the City to establish the necessary protections as mandated by the community governance table would be crucial.

## Objective II: City builds a data ecosystem to track equitable outcomes

If community governance is to be effective, the City should undertake activities to enhance its abilities for collecting and using race-based and socio-demographic data. This work involves efforts to establish institutional responsibility aligned with community governance, implement data systems that balance flexibility and uniformity, and standardize data processes and practices. The goal is to ensure that the City is well-prepared. Organizational and technological readiness to collect and use community data is important for building trust as data stewards for Black communities.

### Emphasis: Responsibility

The City has key areas of responsibility as data holders. Added to the current statutory responsibilities, a new responsibility will be effectively communicating the guidance from the Black community data governance table to leadership and staff across different City areas.

To implement the table's recommendations, clarifying defining roles and responsibilities within the City's organizational structure and processes is imperative. This may involve adapting existing roles or introducing new ones. Addressing key areas of expertise, including privacy, interpretation and analysis, collection, storage and sharing will be essential in implementing effective Black community data governance.

### Emphasis: Architecture

There may be changes needed in the architecture of City data to promote community data governance. The City needs to create an ecosystem that provides flexibility to support interoperability and to meet community governance needs and perspectives.

For instance, Open Data, particularly for the City of Toronto, could serve as a crucial resource to make data accessible to communities and partners. To be properly accessible to Black communities, this could include data literacy tools and multiple user interface options tailored to different audiences. Decisions regarding the most feasible options should be made with the Black community data governance table.

### Emphasis: Standardization

Data management procedures can extend beyond mere legislative and technical compliance to encompass equitable, anti-racist methodologies in the City's data collection, storage, analysis and reporting processes. Feedback from the Black community data governance table can guide the different City divisions, teams and partners that engage with data towards standardized data practices

and processes. This encompasses various aspects, such as data collection templates, data reporting exemptions and data analysis flowcharts.

Data-sharing templates would be a crucial tool for standardization, incorporating elements of accountability to community governance and equity. These standards aim to enable safe, confident and consistent management of race-based data. Given the intersectional needs of Black populations, this standardization can also promote the types of interoperability that would support more useful analysis.

### **Objective III: City harnesses community data to drive action**

Data is inherently dynamic, requiring careful consideration of its movement across the data life cycle and between various data systems. As data infrastructures develop in alignment with community governance, the City must strategize on how to actively monitor community data with an equitable and ethical lens. Continuous oversight of race-based data is vital for maintaining the community governance table's connection to the data. This can ensure that ongoing engagement activities are informed by currently relevant information and enable the City to leverage its entire data repository for positive impact.

#### **Emphasis: Management**

Despite having data standards, the compliance and integration of these practices will differ based on the various divisions and teams. Conducting an environmental scan of their data practices will establish a robust foundation for action planning to align with the Black community data governance table.

These divisions should engage with the table to share the results of their efforts, work through challenges and identify opportunities. Implementing incremental changes enables these divisions to enhance their capacity to handle race-based data, gain a better understanding of its capabilities as a tool and appreciate the sensitive procedures necessary for race-based data.

#### **Emphasis: Control**

Active control mechanisms for data access, sharing and protection that align with community governance table recommendations should then be reflected in specific policies and technological processes. This will be important to maintain the position of the governance table and the effectiveness of its work.

Presently, the sharing of data is perceived as an extra measure, to be considered only under specific circumstances. However, the essence of gathering sociodemographic data lies in its use to tackle the various determinants impacting the well-being of Black communities. Designing sharing and access mechanisms as inherent components, as opposed to a case-by-case basis, is vital to prevent

controls from becoming impediments. These controls should primarily serve to safeguard the well-being of Black communities, especially in instances where data may heighten vulnerability.

### Emphasis: Use

Race-based data will have different implications for divisions and teams based on their functions, and responsibilities. Simultaneously, the Black community data governance table may emphasize specific priority areas or advocate for timely issues affecting Black communities.

It will then be important for the City to understand how divisions and partners will be activated depending on the nature or context of the data. Ultimately, race-based data should play a role in the services and programs provided by the City, and this involvement is expected to improve City's data practices across various internal areas.

# Outcomes

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The Black community data governance framework is designed to embody the opportunities and necessary actions to progress toward an equitable future, fostering thriving Black communities. There are various ways to conceptualize what this means, and how it could manifest. By understanding the ultimate outcomes, the City can ensure that regardless of the approach and methods employed, efforts aligned with these outcomes will contribute to the framework’s purpose, mission and vision.

At its core, this framework is driven by the imperative to establish trust with Black communities through genuine engagement. It is crucial for the City of Toronto to be perceived as a trusted, responsible and accountable entity for Black communities to willingly provide race-based data.

Another overarching goal is to actively involve Black voices and leadership in the decision-making processes related to data. Establishing structures for engaging with Black populations and taking the lead in setting up Black community data governance tables will be crucial to ensuring sustainable accountability.

Ultimately, the framework aims for the City's data holdings to be utilized for the betterment of Black communities, often referred to as “data for good.” Recognizing the significant impact of inequities across various domains – such as health, economic, social and environmental outcomes – on the lives of Black populations, this framework emphasizes the City's role in creating positive change. The City’s capacity to track and monitor these disparities through race-based data is significant to these goals. By doing so, the data can inform and refine the City's service delivery and program development to address the specific needs of Black communities.

## Implementation considerations

While the principles and objectives provide areas of focus, the City should assess the key elements facilitating the implementation of Black community data governance, thereby effectively translating this framework from concept to action. For instance, prioritizing commitment to Black community data governance requires an understanding of the drivers for change within the City and engaging with leadership. Additionally, dedicating resources, personnel and time can empower the City with the capacity to engage effectively and collaborate with the diverse Black communities of Toronto, enhancing its data capabilities. Lastly, adopting sustainable strategies that recognize drivers and critical areas needing attention can play a crucial role in the continuous development of the City's data maturity and relationship with Black communities. These represent examples of the considerations crucial for the success of Black community data governance.

Establishing Black community data governance within the City can take various forms, such as incorporating it into data management policies, developing race-based data programming and implementing technological controls. Also, due to decentralization, there is a risk of uneven distribution of responsibilities across divisions and teams, potentially resulting in fragmented responses to Black

community data governance. An important aspect of this framework is the alignment with and direction from Black communities, achieved through continuous engagement and the establishment of a Black community data governance table.


While City staff and stakeholders may recognize that each division has distinct responsibilities, the public perceives the “City of Toronto” as a unified entity. If each City team or division independently leads engagement, builds governance tables and follows separate implementation guidance, it may result in contradictory actions across the City, eroding community trust. This decentralized approach could lead to redundant resource allocations, and community engagement fatigue, hindering the City's ability to effectively use race-based data for equitable improvement.

Consequently, there may be merit in designating Black community data governance within a City area with the authority to establish policies and standards citywide. City leads and Black communities must collaboratively determine the appropriate placement of the Black community data governance table and how various City teams engage with it in decision-making processes related to data procedures, identifying harm and guidance on data use.

The internal scan identified several approaches, including establishing a Black community data governance table with the City Manager’s Office, leveraging its experience and authority in defining data procedures and engaging with City divisions on data management. This approach allows other parts of the City to use the table’s direction, via the City Manager’s Office, to inform their initiatives on data governance, privacy and management. Alternatively, constructing the Black community data governance table as a standalone entity, like a research ethics board, provides independence. However, it does not offer the leverage needed for its success, so this approach requires effective promotion to ensure awareness among different City stakeholders of their responsibility to collaborate with the table.

## Moving forward

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**“As the City embarks on the journey from principles to practice in Black community data governance, it begins to shape a more equitable future for Black communities.”**

divisions, teams and partners to collaborate with Black communities in defining the vision of success and its potential outcomes. The strategies employed should be transparently shared and widely communicated, not only to showcase the utility of race-based data but also to keep communities informed and engaged.

A transformational first step for the City would be to use this framework to explore the commitments, resources, institutional placement, structure, function and initial composition of a Black community data governance table. Through collaborative efforts, these community-developed objectives and areas of emphasis can be transformed into actionable plans for the City of Toronto. This approach allows the City to activate the necessary divisions and partners, ensuring that every action is endorsed by communities through the centralized community data governance table. Consequently, the City not only strengthens its data capabilities in alignment with other global centres but also enhances Toronto’s reputation as a powerhouse for equity, justice and human rights.

As the City embarks on the journey from principles to practice in Black community data governance, it begins to shape a more equitable future for Black communities. In doing so, it sets a powerful precedent for meaningful collaboration and positive change. This endeavour transcends data, resonating with the very essence of community empowerment.

This framework offers an overview of the various aspects to consider in implementing Black community data governance. It is the joint creation of Black communities and organizational leaders, data experts and City staff and partners.

Ultimately, it will be the responsibility of the City of Toronto’s leadership,



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