

Implementation Roadmap

City of Toronto Black Community Data Governance Implementation Plan

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About this document

The City of Toronto Black Community Data Governance Implementation Plan consists of four documents: an Executive Report, a Consultation Report, this Implementation Roadmap and A Preliminary Model. All documents are available on Wellesley Institute's website at www.wellesleyinstitute.com.

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Acknowledgment of Traditional Land

We wish to acknowledge this land on which Wellesley Institute operates. For thousands of years, it has been the traditional land of the Huron-Wendat, the Seneca and the Mississaugas of the Credit. Today, this meeting place is still the home to many Indigenous people and we are grateful to have the opportunity to work on this land.



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Executive summary

This Implementation Roadmap for the City of Toronto Black Community Data Governance Implementation Plan outlines how to operationalize the Black Community Data Governance Framework, developed in partnership with the City by Wellesley Institute and Black Health Alliance. This initiative builds on the City's Data for Equity Strategy and the Toronto Action Plan to Confront Anti-Black Racism, aiming to ensure that race-based and sociodemographic data about Black communities is collected, managed and used ethically and effectively.

Purpose

This document provides a detailed roadmap for implementing the City of Toronto Black Community Data Governance Framework. It outlines the rationale, phased approach, key actions and supporting tools needed to embed community-driven, anti-racist data governance into municipal systems

This document provides a detailed roadmap for implementing, in five phases, the City of Toronto Black Community Data Governance Framework.

Process

- Consultations with City staff
Three rounds of consultations with multiple City divisions provided insights into engagement practices, organizational structures and challenges related to race-based data governance.
- Literature review
A refreshed review of global and local best practices identified models, frameworks and tools to guide community-driven data governance and implementation strategies
- Strategic meetings
Ongoing meetings with the Data for Equity team and Confronting Anti-Black Racism Unit ensured alignment with City priorities and responsiveness to evolving organizational contexts.
- EGAP Framework Implementation Diagram
The roadmap adapts the EGAP (Engagement, Governance, Access and Protection) implementation roadmap from health systems to Toronto's broader municipal context.

Implementation Phases

- Phase 1: Organizational Agreement and Readiness
This phase focuses on laying the foundation for Black community data governance within the City. It involves clarifying the scope of work, building internal structures, assessing organizational readiness, and creating a compelling vision and business case. Activities include identifying resources, initiating awareness and skill development, and aligning existing strategies with the framework. The goal is to secure leadership buy-in and establish institutional capacity before engaging communities. A monitoring and evaluation plan will be critical to documenting best practices and maintaining accountability.
- Phase 2: Community Engagement
Community engagement is central to the framework, ensuring Black voices shape decisions on race-based data. This phase emphasizes building trust and co-designing priorities through evidence-based engagement strategies. It includes identifying diverse partners, reducing barriers to participation, and creating long-term collaboration structures. Engagement should be iterative and transparent, fostering a social licence for data use and aligning practices with community values.

- Phase 3: Community Governance Table

This phase establishes a representative governance table to guide decisions on data collection, use and protections. The table should reflect diverse expertise and lived experiences while operating transparently and within legal constraints. Key actions include defining its mandate, accountability mechanisms, terms of reference and operational model. The governance table serves as a trusted body to embed community oversight into institutional processes.

- Phase 4: Supporting Access

To enable meaningful participation, communities need equitable access to data and the capacity to use it. This phase focuses on building infrastructure for secure and ethical data sharing, developing user-friendly tools, and providing training for data literacy. It also includes creating standardized documentation, legal agreements, and scalable technology systems. The aim is to empower communities to conduct research and influence decisions using race-based data.

- Phase 5: Ensuring Protections

Safeguards are critical to prevent harm and maintain trust. This phase embeds protections into policies, systems and practices governing race-based data. It involves developing ethical guidelines, implementing technical security measures, and creating multi-step review processes for data use. Extending from foundational trainings provided in Phase 1, additional actions that advance Phase 4 include training staff, conducting audits, and establishing transparency mechanisms such as public reporting. The ultimate goal is to balance access with robust protections aligned with community priorities.

Supporting resources

- Skills Framework: Identifies competencies needed for successful implementation (e.g., anti-Black racism expertise, governance, IT, legal, policy).
- Performance Measures: Sample metrics for monitoring progress across phases.
- Implementation Tool: A practical guide for planning and tracking actions.

Background

In 2020, Toronto City Council approved the Data for Equity Strategy to track disaggregated race-based data and gain a deeper understanding of the experiences of marginalized populations. In tandem with ongoing efforts related to Indigenous data governance, the City acknowledged the growing expectation that communities would be actively engaged in the collection, use and management of their data. To address this, the City of Toronto's Confronting Anti-Black Racism Unit and Data for Equity team commissioned Wellesley Institute and Black Health Alliance to develop a Black Community Data Governance Framework for their data holdings. Recognizing the diverse experiences within Toronto's communities, it was decided that the initial community data governance framework would have a specific focus on Black communities.

The development of the Black Community Data Governance Framework included several phases. A literature review was conducted to identify structures, strategies and success stories of data systems established to drive equity. In addition, an internal scan was performed through consultations with City of Toronto staff to understand the local opportunities for Black community data governance. Moreover, a Black Data Advisory Circle was established, comprised of community experts, thought leaders and representatives with a history of engagement and/or leadership on issues related to race-based data collection and use, data governance and digital technology. The framework was finalized in 2023 and published in 2024.

In 2024, the City of Toronto aimed to incorporate the Black Community Data Governance Framework into its Data for Equity Strategy and corporate data governance policy initiatives. Wellesley Institute and Black Health Alliance were commissioned again to develop guidance on how City divisions and partners can ensure that sociodemographic and disaggregated data about Black communities is collected according to appropriate legislation, policies and protocols, and that the information is managed and used in ways that benefit Black communities.

This implementation plan aims to provide a path to create and integrate the framework with steps on how to address and advance Black data governance in alignment with the Toronto Action Plan to Confront Anti-Black Racism.

The development of this implementation plan was guided by a structured and iterative process designed to reflect both the City's organizational realities and the priorities of the Black Community Data Governance Framework. The process drew on diverse inputs to capture institutional perspectives and emerging practices: consultations, literature review, and strategic meetings. These inputs were synthesized into a roadmap that connects actions to goals and priorities. This is designed to provide continuity in the report to ensure it is evidence-informed and responsive to the City's evolving context.

Sources of input

The development of this implementation plan was guided by a series of structured inputs rather than a traditional research strategy. These inputs were designed to capture practical experiences and organizational perspectives relevant to Black community data governance. They included:

- Consultations with internal City staff across multiple divisions.
- A refresh of the City of Toronto Black Community Data Governance Literature Review search to incorporate emerging work.
- Strategic meetings with the Data for Equity team and the Confronting Anti-Black Racism Unit.

Consultations with staff

Consultations with City divisions were central to gathering insights across three core objectives:

- Understanding how communities and partners are currently engaged in data and race-based data.
- Examining internal environments and workplace structures that influence community governance of race-based data.
- Identifying strategies to manage organizational change that supports the protection and use of race-based data.

These objectives were intentionally aligned with the original Black Community Data Governance Framework to enable a deeper exploration of the City's current state. In addition to mapping the existing landscape, the consultations aimed to surface both strengths and challenges across these focus areas.

Consultations were conducted in three rounds:

- Round 1 (April-June 2024):
This phase focused on assessing the general environment, identifying priorities, and exploring practices and capacities for data governance across the City. Eleven divisions participated in 90-minute focus group sessions, with staff selected by City partners based on their roles and expertise. A tailored set of questions was used to guide each session (see Appendix A).
- Round 2 (August-September 2024):
Building on the findings from Round 1, this phase brought forward a set of strategic goals and priorities to five select divisions. The aim was to gather feedback on practical actions and considerations for implementation. This round also explored institutional structures, processes and histories that shape how specific activities are carried out. A key focus was understanding how responsibilities and accountabilities are assigned across the City based on past experiences.
- Round 3 (May 2025):
The Equity and Accessibility Unit in the Social Development Division hosted a Black Community Data Governance Framework workshop, featuring a presentation by Wellesley Institute and Black Health Alliance. They shared insights on the framework itself and lessons learned from participating in the development of the implementation plan. Five divisions participated in the session. The workshop provided a space for focused discussions around the actions outlined in the draft implementation plan. It also served as a chance to refine how the plan aligns with the current realities of the City, especially in light of its rapidly evolving context, to help ensure the plan remains responsive.

The findings from the consultations were organized by the objectives in the Black Community Data Governance Framework. This was done to identify goals and priorities needed to drive the implementation of the work across the objectives. These goals and priorities were shared with the City divisions engaged in the consultations through an iterative process and was informed by discussions during the strategic meetings.

Literature review

To support implementation plan, a literature review was also conducted to clarify how these goals could be achieved. The original review, completed in 2023, gathered insights on relevant perspectives, resources and initiatives. Recognizing the rapidly evolving nature of this work, the review was refreshed using the same search strategy to capture new resources that could further inform the implementation process.

Strategic meetings

Additionally, strategic meetings with the Data for Equity team and the Confronting Anti-Black Racism Unit ensured that emerging needs, priorities and contextual shifts were addressed in the design of the implementation plan. These occurred from May 2024 to November 2025.

Roadmap development

This Implementation Roadmap was adapted from the EGAP Implementation Guide Diagram, which outlined a series of phases and steps for advancing community data governance for Black communities in the health system. The consultants mapped each action from the EGAP diagram to this implementation plan's goals and priorities. In addition, specific activities for carrying out each action were identified through findings gathered from the literature review.

Ultimately, this final Implementation Roadmap presents actions and activities required at each stage of implementation. They were corresponded to goals and priorities developed through the consultations.

Supporting tools and structures

In addition, a preliminary Implementation Tool was developed to provide a series of steps that can be taken to implement an action related to Black data governance. It serves as a starting point for implementing the various aspects that need to be in place for a successful implementation.

Sample measures to monitor progress and ensure longevity of the implementation plan were developed using previous knowledge of best practices related to evaluation, taking into consideration the different components of the implementation plan. These measures are intended as a starting point for measuring progress and impact and should be further refined with the expertise of an experienced evaluation professional and adjusted as more information about the implementation process is revealed.

Lastly, an exploration was initiated into how community governance tables could be embedded within the City's processes. While the final structure should be determined through engagement with Toronto's Black communities, a preliminary model was developed. This model drew on examples identified in the literature review and was analyzed to understand the bodies, responsibilities and structures that support community data governance. Findings from the consultations were joined with the literature review findings to propose an initial structure for consideration.

Implementation Roadmap

The Black Community Data Governance Framework was inspired by the EGAP framework released by the Black Health Equity Working Group¹. Originally created in response to the COVID-19 pandemic, EGAP aimed to support data sovereignty for Black communities within Ontario's healthcare system.

While EGAP focused on health data, the City of Toronto's data landscape spans far beyond, covering areas such as community safety, housing and children's services. This broader scope prompted the development of the new framework tailored to the City's context. It was collaboratively built with communities, institutional partners, City staff and subject matter experts.

Still, the EGAP framework significantly influenced the City's approach. Its four core principles are embedded in the first objective of the Black Community Data Governance Framework, which, at the time of development, was the only Black-focused, Canadian-specific community data governance model available. Similarly, this implementation plan for the City's framework also drew heavily from lessons learned through EGAP's implementation². One key resource was an EGAP Implementation Guide, published by Wellesley Institute, which outlined an implementation pathway³ informed by health equity planning experts. Though the guide was designed for healthcare institutions, it provided a valuable foundation for shaping the City's roadmap.

To align the guide with the City's broader municipal context, action areas were revised, and activities were incorporated based on the literature review. Each action was mapped to demonstrate how it supported the goals and priorities. The roadmap also highlights the core skills identified in the literature (Appendix D). It is accompanied by preliminary performance measures (Appendix E) and an Implementation Tool (Appendix F), which are intended as starting points to guide early implementation. These resources are not final or exhaustive, as the City should first determine its specific implementation focus to develop a complete version. Instead, they are designed to help divisions begin the work and can be further refined and expanded as the City's approach to Black community data governance evolves.

This Implementation Roadmap follows the same five phases:

1. Organizational agreement and readiness
2. Community engagement
3. Community governance table
4. Supporting access
5. Ensuring protections

5 phases of implementation

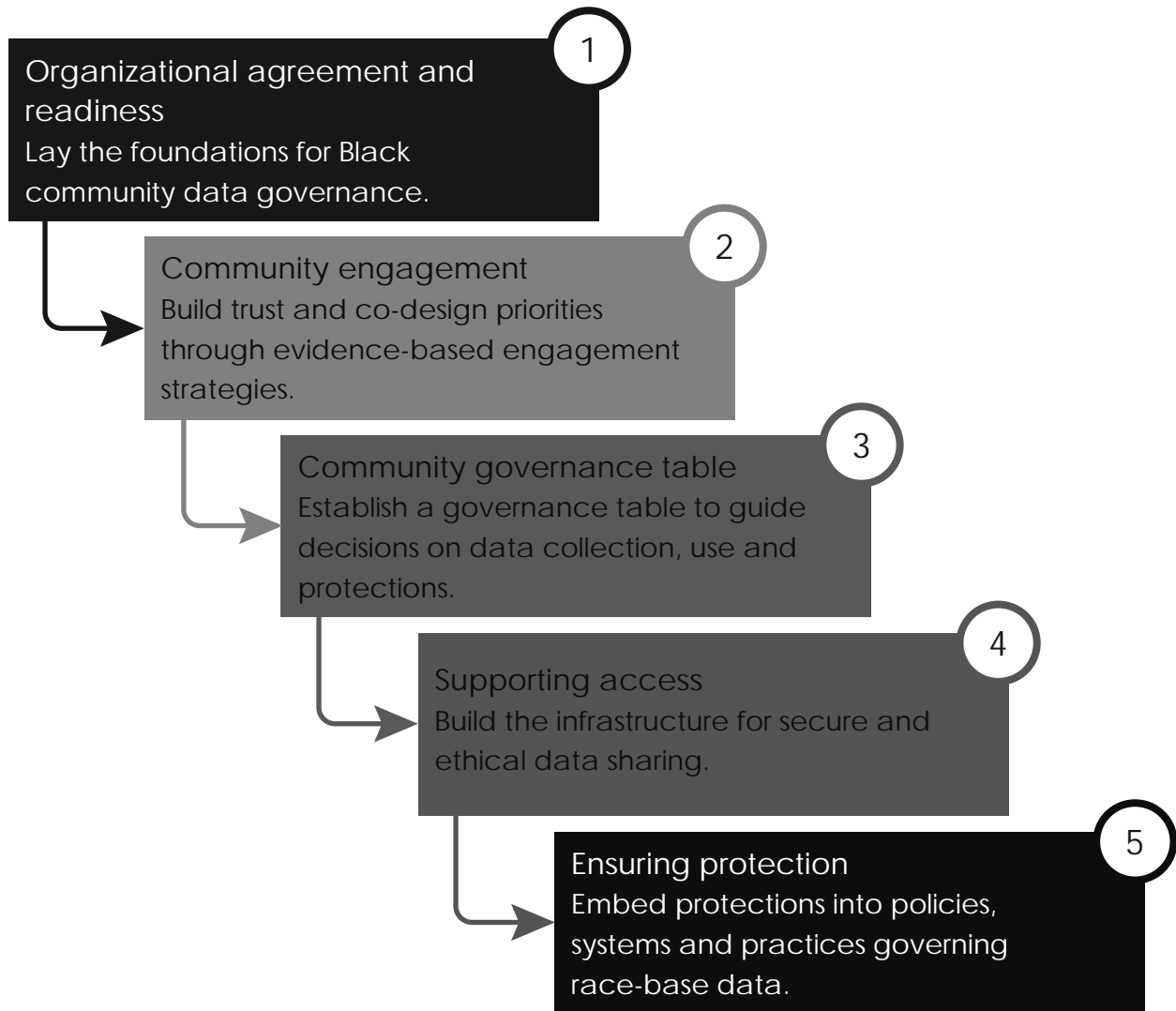


Figure 1. Five phases of the Implementation Roadmap

Phase 1: Organizational agreement and readiness

For Black community governance to move from theory into practice, there should first be a tangible starting point – a concrete effort to implement and rally resources around. This initial foundation creates the conditions to begin socializing the framework and implementation plan with leaders across the City, clarifying what is needed in terms of support, and justifying a closer look at how data is currently being governed.

Establishing this groundwork is about building readiness. It ensures that when challenges arise or pivots become necessary, there is already a shared commitment and agreement to move the work forward. This readiness becomes the anchor for sustained change.

It also strengthens the City's ability to communicate with communities in a more confident and transparent way. With something real to point to, the City can demonstrate its accountability to the work and begin meaningful conversations about how it tends to uphold its commitments.

The actions and activities within this phase should not be interpreted as linear or sequential. Rather, some steps may need to be initiated internally before anything else can begin, while others might emerge after engaging with community in an iterative nature. Others may occur simultaneously with other phases. For example, defining the scope and establishing internal structures to support the work may be essential early on to lay the groundwork for meaningful engagement. Subsequent rounds of community engagement could then help illustrate the importance of the work, positioning the City to secure the support needed to investigate data practices and mobilize resources for change management. This phase is the longest, the least concrete, and yet the most important – its specific steps often revisited and refined throughout all phases of implementation.

The timeline for completing this phase will be determined entirely by the scope and scale of the pilot initiatives. Drawing from similar efforts at other institutions, it is reasonable to expect this phase to take at least three years. Crucially, because this work represents an evolving and active concept rather than a fixed project, it should be understood as a phase that will be revisited continuously until the ideal of full Black data sovereignty is fully realized.

The following actions were outlined for this phase:

- Agree on the preliminary scope of Black community data governance work
- Build a sustainable Black community data governance internal organizational architecture
- Understand current organizational preparedness for Black community data governance
- Understand current data holdings
- Understand current data governance
- Understand possibilities for alignment between current strategies and Black community data governance
- Understand change management strategy for the organization
- Identify resources for internal change, engagement, governance table development and running, and access and protections
- Initiate awareness, knowledge development, education, and skill development (anti-racism and Black community data governance)
- Use tools to track implementation

Table 1. Actions and activities for Phase 1: Organizational agreement and readiness

Actions	Description	Key activities	Priority	Skills*
<p>Agree on the preliminary scope of Black community data governance work</p>	<p>Develop a foundational vision statement on race-based data as well as a purpose statement on the strategic relevance of Black community data governance.</p>	<p>Determine a preliminary vision that clearly articulates:</p> <ul style="list-style-type: none"> • The mutual benefits of improved race-based data collection, use and sharing. • The risks involved and the City’s commitments to address them. • An understanding of the historical context and lived experiences of Black communities in Toronto. <p>Accompany the vision with a compelling business case that outlines:</p> <ul style="list-style-type: none"> • The rationale for undertaking this work. • Tangible benefits for City divisions, agencies, boards and commissions staff and the public. <p>Use the vision to identify the City’s perspective on the purpose of Black community data governance, such as:</p> <ul style="list-style-type: none"> • To conduct research on community-centred priorities • To improve service delivery for Black communities • To develop sustainable policy that benefits Black communities <p>Plan for the vision to be evaluated by communities to determine interest and finalize vision once internal foundational work has been completed</p>	<p>1.1.3. 1.2.6. 3.1.4.</p>	<p>ABR BS GOV POL STR</p>

Actions	Description	Key activities	Priority	Skills*
	<p>Develop a stakeholder engagement and management strategy to identify how to address barriers.</p>	<p>Ensure collaboration is intentional and strategically used to drive implementation.</p> <ul style="list-style-type: none"> • Include leadership and staff across all levels and areas. <p>Align engagement efforts with the principles of the Black Community Data Governance Framework.</p> <p>Create spaces for implementation team to brainstorm strategies and levers to drive progress:</p> <ul style="list-style-type: none"> • Form working groups or committees for focused collaboration. • Establish communities of practice for staff to share experiences and reflect on planning. • Host intensive workshops for knowledge exchange and strategic visioning. <p>Assign liaison roles within each division or team for ongoing collaboration, serving as a clear point of contact.</p> <p>Establish communication channels for real-time issue handling.</p>	<p>3.1.5. 3.3.2.</p>	<p>CB COM PAR</p>

Actions	Description	Key activities	Priority	Skills*
	Determine the scope and structure of initial implementation efforts.	<p>Define the scope of initial efforts between City-wide, divisional, program-specific or involving external partners and agencies.</p> <p>Choose starting point(s) based on:</p> <ul style="list-style-type: none"> • teams, divisions or programs with commitment, capacity and resources • relevance and impact for communities • opportunities for collaboration across teams, programs or divisions <p>Identify and support early adopter teams.</p> <p>Provide policy, technology and legal support to scale efforts.</p> <p>Identify how race-based data will be used to support work across these categories:</p> <ul style="list-style-type: none"> • Operational use: drive programs and interventions (e.g. service coordination, case management). • Analytics and research: explore systemic issues and inform policy (e.g. employment outcomes for communities). • Indicators and reporting: track disparities and monitor progress (e.g. measuring program impact). 	<p>1.2.1.</p> <p>1.2.2.</p> <p>2.1.2.</p> <p>2.1.3.</p> <p>2.1.4.</p> <p>3.1.1.</p> <p>3.1.3.</p> <p>3.1.4.</p> <p>3.1.5.</p>	<p>ABR</p> <p>CYB</p> <p>ET</p> <p>GOV</p> <p>IT</p> <p>LEG</p> <p>PAR</p> <p>POL</p> <p>RES</p> <p>STR</p>

Actions	Description	Key activities	Priority	Skills*
	<p>Establish a clear rationale for using race-based data.</p>	<p>Identify specific issues (e.g. housing outcomes, access to services, health promotion).</p> <p>Gather evidence from multiple sources (e.g. format reports, research, community engagement, lived experiences).</p> <p>Explore how the issue connects to City processes, programs and structures.</p> <p>Conduct research to uncover relationships between:</p> <ul style="list-style-type: none"> • the problem • lived experiences and outcomes of Black communities • social and structural determinants <p>Develop specific objectives to guide:</p> <ul style="list-style-type: none"> • identification of relevant datasets • selection of partners <p>Create a full data use plan that includes:</p> <ul style="list-style-type: none"> • the issue being addressed • affected communities within Black communities • ethical considerations • intended impact within and beyond the city 	<p>1.2.4.</p> <p>1.2.6.</p> <p>2.2.1.</p> <p>2.2.2.</p> <p>3.1.5.</p> <p>3.2.1.</p>	<p>POL</p> <p>RES</p>

Actions	Description	Key activities	Priority	Skills*
Build a sustainable Black community data governance internal organizational architecture	Build leadership and oversight capacity.	<p>Designate a clear and authoritative internal body responsible for data governance (e.g. a position, division, or coalition of senior representatives).</p> <p>Ensure this leadership is actively engaged in the implementation plan.</p> <p>Provide consistent support and direction to divisions, especially when navigating complex scenarios.</p> <p>Equip senior leaders with persuasive communication materials.</p> <p>Include examples that demonstrate impact and positive outcomes.</p>	1.1.2. 2.1.1. 2.1.2. 3.1.2.	ABR COM GOV LEG PAR POL STR
	Establish a dedicated, cross-divisional governance team.	<p>Form a team that includes both senior leaders and operational staff.</p> <p>Ensure membership is tied to roles, not individuals, based on expertise and institutional responsibilities.</p> <p>Document roles and responsibilities for each member, team and division based on their capacity as a core or advisory member.</p> <p>Integrate the team into an existing committee or table if mandates align.</p> <p>Ensure dedicated time and resources are committed specifically to Black community data governance.</p> <p>Create sub-working groups focused on key areas, such as data governance, community engagement or capacity building.</p>	1.1.2. 2.1.1. 2.1.2. 2.1.3. 3.1.4.	ABR GOV PAR STR

Actions	Description	Key activities	Priority	Skills*
	Detail the group's structure and operational model.	<p>Set a defined term and realistic goals aligned with available resources.</p> <p>Create new roles where existing ones are insufficient to support the work.</p> <p>Establish small-scale milestones to test processes and uncover challenges early.</p> <p>Adopt a flexible decision-making framework to balance adaptability and accountability.</p> <p>Base responsibilities on expertise and institutional role.</p>	2.1.1. 2.1.2. 2.2.2. 3.1.2.	ABR GOV PAR STR
Understand current organizational preparedness for Black community data governance	Begin with assessing feasibility and readiness.	<p>Establish whether the organization is prepared to begin implementation and identify strategic entry points.</p> <p>Use guiding questions to assess readiness:</p> <ul style="list-style-type: none"> • Does the effort address a problem Black communities want solved? • What data, resources and leadership support are needed? • Will it require cross-department collaboration or external partnership? • What services are necessary to act on race-based data (e.g. analytics, IT, community engagement)? 	2.1.2. 2.1.3. 2.1.4. 2.3.3. 3.1.3.	BS GOV PAR POL STR

Actions	Description	Key activities	Priority	Skills*
	Identify and analyze barriers to readiness.	<p>Understand what may hinder implementation and use this insight to guide planning and resource allocation.</p> <p>Use these four key areas to guide identification of barriers and goals:</p> <ul style="list-style-type: none"> • legal and regulatory (e.g. outdated legislation, unclear organizational data-sharing policies, lack of standards, data ownership or copyright issues, privacy concerns) • organizational and motivational (e.g. inadequate incentives, vague value, poor coordination or roles and resources) • social and ethical (e.g. challenges in measuring impact, community data governance, digital divide, political tensions around race-based data, equity concerns or public trust, difficulty de-biasing datasets, translating insights into interventions) • technical and data (e.g. privacy risks, poor data quality or relevance, lack of technical capacity, absence of data standards or metadata, limited control) 	<p>2.1.2.</p> <p>2.3.3.</p> <p>3.1.3.</p>	<p>ABR</p> <p>BS</p> <p>CBS</p> <p>ET</p> <p>GOV</p> <p>IT</p> <p>LEG</p> <p>PAR</p> <p>RES</p> <p>STR</p>

Actions	Description	Key activities	Priority	Skills*
Understand current data holdings	Catalog all relevant datasets.	<p>Create a comprehensive inventory of datasets aligned with the project vision and goals.</p> <p>Identify where race-based data is being collected, stored, shared and used.</p> <p>Identify datasets without race-based data that support operational, analytical and reporting needs.</p> <p>Ensure cataloging reflects both technical metadata standards and community relevance.</p>	2.2.1. 3.1.3.	IT CBS PAR
	Identify strengths and limitations of current data systems.	<p>Evaluate the quality and usability of existing data to inform future governance decisions.</p> <p>Identify strengths such as interoperability, structured datasets or high-quality data.</p> <p>Identify limitations such as siloed data, outdated formatting or inconsistent standards.</p> <p>Assess readiness for cross-divisional data sharing.</p>	3.1.3. 2.3.3.	CBS IT STR

Actions	Description	Key activities	Priority	Skills*
Understand current data holdings	Define the core elements of a data governance strategy.	<p>Ensure the strategy captures relevant dimensions for data governance:</p> <ul style="list-style-type: none"> • Hosting governance: the decision-making people and processes as race-based data is acquired (e.g. community engagement and governance, stakeholder oversight, access processes, legal agreements). • Managing technology: the enablers of sharing and using race-based data (e.g. data transfer, security, storage, linkage). • Conducting analysis: the transformation of race-based data into action (e.g. methodologies, visualizations, interpretations, policy development, knowledge mobilization). 	1.3.1. 1.3.2. 1.3.5. 1.3.7. 3.2.1.	GOV CB ET GOV IT LEG PAR POL RES STR
	Evaluate existing governance practices.	<p>Review the teams that are, and how race-based data is, currently collected, shared, and governed.</p> <p>Document findings, such as presence of governance documents, alignment with best practices, accessibility of policies and public transparency.</p> <p>Identify the presence and level of detail in existing policies, procedures and standards related to race-based data use.</p> <p>Consolidate decisions regarding race-based data governance and share documentation with broader data governance leadership.</p>	1.3.7. 2.2.2. 2.2.4.	CBS GOV IT LEG PAR POL STR

Actions	Description	Key activities	Priority	Skills*
		<p>Analyze common patterns in eligibility criteria, access conditions and pathways and impact of legal compliance and operational feasibility.</p> <p>Lead a legal review with legal counsel and leadership to:</p> <ul style="list-style-type: none"> • Confirm there are no legal barriers to implementing race-based data practices. • Identify how these practices improve the legitimacy of the City from a legal or regulatory approach, such as better ability to comply with the Ontario Human Rights Code or reducing risk for inappropriate data use. 		
<p>Understand possibilities for alignment between current strategies and Black community data governance</p>	<p>Clarify the City's equity and data goals.</p>	<p>Identify existing commitments relevant to the framework, such as racial equity, civic participation, data governance, cybersecurity and data literacy.</p> <p>Determine how race-based data fits into current strategic plans.</p> <p>Align existing commitments with the Black Community Data Governance Framework.</p> <p>Collaborate with City stakeholders to demonstrate value of Black community data governance.</p>	<p>2.1.2.</p> <p>2.1.3.</p> <p>2.1.4.</p>	<p>ABR</p> <p>BS</p> <p>COM</p> <p>PAR</p> <p>POL</p> <p>STR</p>

Actions	Description	Key activities	Priority	Skills*
	Integrate the Black Community Data Governance Framework into policy infrastructure.	<p>Ensure race-based data and Black community data governance is embedded across all relevant City strategies, policies and practices.</p> <p>Apply even if the policy does not explicitly address race-based data.</p> <p>Use the framework as a strategic lever to secure resources and institutional support.</p> <p>Make governance-related documents publicly accessible online and share widely across City staff, agencies and partners.</p>	1.3.5. 1.3.7.	ABR BS COM GOV PAR STR
Understand change management strategy for the organization	Frame the change.	<p>Frame Black community data governance as a long-term cultural shift toward ethical data stewardship.</p> <p>Emphasize this is not a single initiative, but a sustained commitment to changing how the City approaches data, equity and accountability.</p>	2.2.2. 3.1.5. 3.1.7.	ABR COM PAR
	Align internal divisions.	<p>Ensure internal divisions are aligned with the vision to build momentum and trust.</p> <p>Embed the vision into data governance initiatives and documents to make it operational.</p> <p>Engage legal professionals with subject matter expertise to ensure consistent support.</p>	2.1.3. 2.1.4. 3.1.5.	CB COM LEG PAR STR

Actions	Description	Key activities	Priority	Skills*
	Communicate the vision.	<p>Equip staff and stakeholders with clear understanding of the mission.</p> <p>Craft tailored messaging:</p> <ul style="list-style-type: none"> • Start with a high-level vision and refine through stakeholder feedback. • Create versions for Black communities, technical experts, senior leadership, policymakers and the public. • Explain why Black data governance matters, how it protects privacy and how it benefits communities. • Address common sentiments directly. • Provide guidance on responding to reactionary emails. • Share information sheets and curated media examples. <p>Use multiple channels to share the message internally and externally:</p> <ul style="list-style-type: none"> • town halls and community meetings • internal workshops and training sessions • digital platforms (e.g. social media, newsletters) • one-on-one briefings for key decision-makers 	<p>2.1.4.</p> <p>3.1.5.</p> <p>3.1.7.</p>	<p>CB</p> <p>COM</p> <p>PAR</p>

Actions	Description	Key activities	Priority	Skills*
	Embed the change into policies.	<p>Institutionalize the change through policy infrastructure.</p> <p>Ensure policies that reflect the vision, goals and strategic direction of Black community data governance.</p> <p>Develop a dedicated policy that connects individual efforts to the broader framework.</p> <p>Establish a cross-divisional policy to:</p> <ul style="list-style-type: none"> • Enable collaboration across teams. • Clarify roles and responsibilities. 	<p>2.2.2.</p> <p>3.1.3.</p> <p>3.1.4.</p> <p>3.1.6.</p>	<p>CB</p> <p>COM</p> <p>POL</p> <p>PAR</p>
Identify resources for internal change, engagement, governance table development and running, and access and protections	Assess funding needs and scope.	<p>Identify what specifically needs to be funded (e.g. staffing, infrastructure, pilot projects, long-term systems change).</p> <p>Clarify the type of funding required (e.g. project-based, core-support, mixed funding models).</p>	3.1.9.	<p>BS</p> <p>GOV</p> <p>STR</p>
	Evaluate the current funding landscape.	<p>Understand existing resource availability and identify opportunities.</p> <p>Ask key questions, such as:</p> <ul style="list-style-type: none"> • Are existing resources sufficient? • Are there federal, provincial or municipal opportunities that align with your goals? • Are there philanthropic grants, academic partnerships or private sector support available? <p>Consider funding timelines and what is needed in the short, medium and long term.</p> <p>Align funding phases to maintain momentum and strategic focus.</p>	<p>2.2.1.</p> <p>3.1.4.</p> <p>3.1.9.</p>	<p>BS</p> <p>GOV</p> <p>STR</p>

Actions	Description	Key activities	Priority	Skills*
	<p>Create a funding strategy to support race-based data governance.</p>	<p>Secure dedicated investment.</p> <p>Ensure funding is explicit and protected from competing priorities.</p> <p>Prioritize areas requiring additional investment (e.g. sta ng, infrastructure, systems).</p> <p>Address disparities between teams.</p> <p>Demonstrate alignment with strategic commitments.</p> <p>Show how race-based data and Black community data governance supports broader organizational goals.</p>	<p>2.2.2.</p> <p>3.1.4.</p> <p>3.1.9.</p>	<p>BS</p> <p>GOV</p> <p>STR</p>
	<p>Monitor and report on funding impact.</p>	<p>Strengthen future funding applications and demonstrate value.</p> <p>Include mechanisms to track and articulate impact (e.g. time saved through improved data processes, shared costs across services).</p> <p>Use findings to refine strategy and support future investment.</p>	<p>3.1.10.</p>	<p>BS</p> <p>GOV</p> <p>STR</p>

Actions	Description	Key activities	Priority	Skills*
Initiate awareness, knowledge development, education, and skill development (anti-racism and Black community data governance)	Start with foundational education.	<p>Cover general data literacy and data governance principles.</p> <p>Introduce race-based data use and the Black Community Data Governance Framework.</p> <p>Explain its purpose, potential and relevance to both the City and Black communities.</p> <p>Bridge leadership and technical teams to foster informed participation and long-term buy-in.</p>	3.1.8.	ABR CYB IT PAR LEG STR RES
	Identify and address learning gaps.	<p>Assess gaps in data literacy and understanding of community governance.</p> <p>Consider recruitment of equity-focused data professionals with technical and equity expertise.</p> <p>Develop internal training and independent learning opportunities (e.g. webinars, tutorials, workshops).</p> <p>Ensure they address areas such as anti-Black racism, ethics, research and analytics, cybersecurity, legal frameworks, program design and data sharing.</p> <p>Tailor trainings to different audiences:</p> <ul style="list-style-type: none"> • leadership (e.g. understanding strategic relevance) • operational teams (e.g. process compliance) • partners (e.g. collaboration with City staff) <p>Establish ongoing professional development mechanisms (e.g. certificate programs, regular training cycles).</p>	2.1.4. 3.1.3. 3.1.8.	ABR BS CB COM PAR RES STR

Actions	Description	Key activities	Priority	Skills*
	Launch foundational sessions and support structures for implementation.	Prepare staff for change and ensure clarity around expectations. Address key stakeholder concerns, such as: <ul style="list-style-type: none"> • Why this change is necessary? • How it may affect individuals? • What supports are in place? • What does a cost-benefit analysis demonstrate? Clearly outline logistics (e.g. scheduling, costs, internal and community consultation, staff supports).	2.1.4. 3.1.5. 3.1.8.	CB COM PAR
	Create feedback channels for improvement.	Ensure training remains responsive to staff experiences. Allow users to: <ul style="list-style-type: none"> • suggest improvements • identify additional topics • reflect on how training connects to their work 	3.1.8.	CB

Actions	Description	Key activities	Priority	Skills*
Use tools to track implementation	Collate tools for implementation management and monitoring.	<p>Conduct a scan of existing tools and guides that support equity-focused institutional change through data, such as the health equity audit cycle.</p> <p>Identify strategies and processes that align with the City's operational areas (e.g., health, housing, recreational services) through an environmental scan, including key gaps and barriers to driving change.</p> <p>Identify the:</p> <ul style="list-style-type: none"> • purpose and agreements established among stakeholders • relevant community groups and identified gaps • data sources and supporting evidence • processes for designing and implementing actionable changes • potential avenues for investment to support change • specific measures or outcomes of interest, along with evaluative frameworks or tools to track progress comprehensively 	2.2.1. 2.2.5. 3.1.3.	ABR BS GOV PAR STR
	Adapt tools to fit the implementation context.	<p>Apply best practice planning guides where available, ensuring they are suited to the implementation context.</p> <p>Where necessary, adapt planning guides to reflect the initiative's specific goals, structures and intended outcomes.</p>	2.2.1. 2.2.5.	BS PAR STR

Actions	Description	Key activities	Priority	Skills*
	Monitor and evaluate processes and outcomes.	<p>Use planning guides to document practices and progress in terms of processes and outcomes related to the race-based data initiative.</p> <p>Assign accountability to designated staff to complete, review and convene meetings focused on the planning guide, ensuring race-based data is ultimately used to inform and drive change.</p>	3.1.10. 3.3.7.	BS PAR STR

*Refer to Appendix A for short-form definitions.

Phase 2: Community engagement

Until now, the work has largely taken place internally. However, the core value of the Black Community Data Governance Framework is the centring of community voices. With that in mind, it is now time to begin direct engagement – developing and implementing strategies to meaningfully connect Black community members across the City of Toronto.

These engagements should extend beyond community members. It is equally important to introduce communities to the broader network of individuals and institutions that will be involved in race-based data initiatives beyond the City. Strategic thinking is essential here. It is necessary to consider how best to engage these stakeholders and draw on proven models that foster both community involvement and thoughtful conversations around data.

These engagements should not be treated as isolated or one-off activities. Rather, they should be understood as part of a larger effort to embed Black communities in the governance of race-based data. While it is crucial to remain practical and focused on the initiative at hand, the broader context around data and technologies should be considered. By learning about community preferences and priorities, and by building trust through accountability and demonstrating the potential benefits of race-based data, greater clarity can be gained on the protections that communities deem necessary when benefits are perceived to be worthwhile.

One potential approach may involve establishing a community governance table. However, prior to this, it is critical to generate interest and gain insight into preferred governance structures through engagements. This process could serve as the foundation for building a shared agreement.

As with Phase 1, establishing a definitive timeline for this phase is challenging. It hinges on understanding the extent to which Black communities in Toronto currently trust the City's ability to manage race-based data. The time and effort needed to build this trust and to reach consensus on the concept of a Black community data governance table must be guided by communities themselves, not external influences. Therefore, if defining a timeline is necessary, it must begin with a deliberate effort to understand existing relationships with Black communities and what is required to move forward.

Accordingly, the following actions have been outlined for this phase:

- Identify partners
- Use an evidence-based model of community engagement
- Develop a long-term strategy for effective collaboration on current and future race-based data use and analysis initiatives
- Engage the community in considering data release and use

Table 2. Actions and activities for Phase 2: Community engagement

Actions	Description	Key activities	Priority	Skills*
Identify partners	Clarify the purpose of engagement.	<p>Clearly state why engagement is necessary, such as:</p> <ul style="list-style-type: none"> • Ensure data benefits the communities. • Ensure community priorities shape the data process. • Embed engagement throughout the entire data cycle. <p>Define the purpose based on the audience for engagement, ranging from communities, community partners or institutional stakeholders.</p>	1.1.1. 1.1.7.	ABR EN PAR COM
	Identify a broad range of stakeholders to involve.	<p>Build a diverse and informed network to support meaningful engagement with:</p> <ul style="list-style-type: none"> • community members • relevant professionals (e.g. clinicians, shelter staff, youth programming providers) • subject matter and research experts (e.g. academics, statisticians, data scientists) • community partners (e.g. cultural associations, advocacy groups) • policy stakeholders 	1.1.2. 1.1.3. 1.2.2.	EN PAR
	Select community organizational partners to co-facilitate engagement.	<p>Identify 10-12 community partners with strong communication networks and service capacity.</p> <p>Ensure diversity in communities served, geographic location and area of focus.</p> <p>Dedicate resources and structures to support these community partners to lead engagement.</p>	1.2.1. 1.2.2.	EN PAR

Actions	Description	Key activities	Priority	Skills*
Use an evidence-based model of community engagement**	Apply successful examples of engagement focused on data.	<p>Use proven models to discuss data with communities.</p> <p>Reference and adapt existing engagement formats, such as focus groups, citizen juries and listening sessions.</p> <p>Use co-design processes to empower communities.</p>	<p>1.1.1.</p> <p>1.1.4.</p> <p>3.2.2.</p>	<p>GOV</p> <p>EN</p> <p>PAR</p> <p>RES</p> <p>COM</p>
	Engage organizational partners in structured engagements.	<p>Gather input on priorities, challenges, and opportunities for data partnerships.</p> <p>Host one-time and ongoing workshops.</p> <p>Focus on data use, research and policy.</p> <p>Plan for data collection during these engagements.</p> <p>Use workshop formats such as Data as Campfire, Scope-a-thons, and Neighbourhood Power Building.</p>	<p>1.2.1.</p> <p>1.2.2.</p> <p>1.2.3.</p> <p>1.2.6</p> <p>2.1.2.</p> <p>2.1.4.</p> <p>3.2.2.</p>	<p>EN</p> <p>PAR</p> <p>RES</p>
Develop a long-term strategy for effective collaboration on current and future race-based data use and analysis initiatives	Ensure diverse and representative engagement.	<p>Gather meaningful, community-informed insights that reflect the full diversity of Black communities in Toronto.</p> <ul style="list-style-type: none"> • Include representation across gender, age, ethnicity, sexuality, socio-economic status, disability, neighbourhood, service use, attitudes towards data and levels of data literacy. • Include subject matter experts from Toronto’s Black communities. • Ensure that honoraria and resources are provided. • Monitor data on engagements to identify gaps in specific communities or groups. 	<p>1.2.1.</p> <p>1.2.2.</p>	<p>EN</p> <p>PAR</p> <p>RES</p>

Actions	Description	Key activities	Priority	Skills*
	Build public awareness of the City's commitment to data equity.	<p>Shift perceptions and increase visibility of race-based data initiatives.</p> <p>Use a mix of communication channels:</p> <ul style="list-style-type: none"> • online platforms • traditional media • messaging from trusted community partners <p>Ensure updates are timely, precise and clearly articulated.</p> <p>Create person-to-person forums for direct engagement with City staff.</p> <p>Track shifts in public interest and engagement over time.</p>	1.1.7. 1.2.5.	COM RES
	Develop policies and structures to support engagement.	<p>Create and implement policies and practices for engaging community organizational partners.</p> <p>Form a Community Data Partnership Committee if feasible.</p>	1.1.2. 1.2.1. 1.2.4.	GOV POL STR
	Reduce barriers to participation.	<p>Tailor materials to address language and literacy barriers.</p> <p>Offer supports such as childcare, transportation, honoraria and food and refreshments.</p> <p>Use arts-based or cultural practices to create welcoming spaces.</p> <p>Host events in familiar, trusted locations.</p> <p>Use trauma-informed approaches.</p>	1.1.1. 1.2.1.	ABR CB COM EN

Actions	Description	Key activities	Priority	Skills*
Engage the community in considering data release and use	Develop a social licence for race-based data and Black community data governance.	<p>Gain consensus on the need for the City to use race-based data.</p> <p>Explain how the City identified the issue, what governance activities have already taken place, and why race-based data is necessary to address the problem.</p> <p>Discuss how to build trust in the City’s ability to responsibly use race-based data.</p> <p>Explore approaches for how Black communities can govern race-based data.</p> <p>Gain approval and assess interest in the establishment of Black community data governance.</p>	<p>1.1.5.</p> <p>1.1.6.</p> <p>1.2.3.</p> <p>1.2.5.</p> <p>1.2.6.</p> <p>1.3.1.</p>	<p>ABR</p> <p>CB</p> <p>COM</p> <p>EN</p> <p>GOV</p>
	Focus on race-based data practices that align with communities.	<p>Discuss the impacts and risks of stewarding race-based data as well as the necessary safeguards.</p> <p>Identify in what contexts Black communities support race-based data use and sharing.</p> <p>Develop pathways to communicate findings internally and externally.</p> <p>Develop standards that guide anti-racist practices.</p>	<p>1.1.1.</p> <p>1.2.1.</p> <p>1.2.3.</p> <p>1.2.6.</p>	<p>ABR</p> <p>COM</p> <p>EN</p> <p>RES</p> <p>POL</p>

*Refer to Appendix A for short-form definitions.

**Refer to Literature supports in the Consultation Report.

Phase 3: Community governance table

Engagement processes lay the groundwork for establishing a community governance table. This table has the potential to serve as a mechanism for identifying the preferences and priorities of Black communities in relation to decision-making on race-based data. While no single table can represent the full diversity of views within Black communities, just as democratic bodies do not capture every perspective, it can function as a trusted entity recognized by communities as having the legitimacy to make decisions.

Still, transparency is key. Decisions made by the community governance table should be as open and accountable as those made by the City. This ensures continued trust and reinforces the table's role as a representative structure. The scope of decisions may include matters such as data collection and analysis, supporting access to data, representing community needs, strategizing on safeguards and protections, and setting goals for data.

However, the function and scope of the table should not be prescribed by this Implementation Roadmap. These elements should emerge from multiple perspectives. It should be grounded in what communities identify as meaningful through engagement processes, particularly as understanding grows around the potential benefits and risks associated with race-based data. While full community data sovereignty for Black communities in Toronto remains the goal, these elements will also be shaped by legislative and regulatory constraints. These constraints should be clearly communicated to communities throughout the process to help identify feasible solutions that meet their needs while respecting the rules the City is required to follow. The table's design will also depend on the City's current capacity to share power, shaped by its political, structural and technological realities. As such, recognizing that this is a long-term effort, the table should be positioned to drive change without overpromising its influence.

Determining the composition of the table is an important step. The City should explore what types of experience and knowledge are necessary to support informed decision-making in the context of data and technology. At the same time, the governance table should be integrated into broader City planning and operational processes. It cannot operate in isolation. Its decisions should be embedded in institutional structures to ensure accountability and impact. Once membership and procedural considerations are clarified, further engagement will be needed to define the table's structure, scope and strategic agenda. These elements will help establish its role in relation to both the current initiative and the City more broadly.

The following actions have been identified for this phase:

- Identify people who could help form a governance table
- Identify and action an accountability mechanism for the governance table and the institution
- Set clear terms of reference, period of meetings and table processes
- Discuss and decide on data collection, analysis, use, management and protections
- Set a target for the impact of data use such as decreasing specific inequities

Table 3. Actions and activities for Phase 3: Community governance table

Actions	Description	Key activities	Priority	Skills*
Identify people who could help form a governance table	Establish inclusive and representative membership.	<p>Ensure the governance table reflects those with lived experience and a diversity of expertise:</p> <ul style="list-style-type: none"> • Include health equity professionals with technical expertise (e.g. sociodemographic data, community-based research, health systems, artificial intelligence) • Include members of the Black community-at-large 	<p>1.1.3. 1.3.1. 1.3.2.</p>	<p>EN COM</p>
Identify and action an accountability mechanism for the governance table and the institution	Establish a mandate and accountability framework.	<p>Define the governance table’s authority, responsibilities and accountability mechanisms.</p> <p>Develop a clear mandate for the Black community governance table.</p> <p>Outline priorities for policies and practices related to Black community data governance.</p> <p>Ensure alignment with community needs and ethical standards as defined by community.</p> <p>Ensure voluntary participation and the right to withdraw.</p>	<p>1.3.2. 1.3.5.</p>	<p>ABR ET GOV POL STR</p>

Actions	Description	Key activities	Priority	Skills*
	Designate a liaison body to support governance operations.	<p>Identify an internal liaison for the Black community governance table and their responsibilities, such as:</p> <ul style="list-style-type: none"> • recruiting members for the governance table • providing backbone support and coordination across divisions • communicating between the City, internal divisions and the governance table • facilitating the inaugural meeting of the governance table <p>Ensure capacity to host discussions on community power, humanizing data and improving data systems.</p> <p>Establish relevant sub-committees if necessary to focus on areas such as direct community engagement, organizational partnerships or administrating the Black community governance table.</p>	1.3.2. 1.3.5.	CB COM GOV
	Define communication and transparency mechanisms.	<p>Clarify how often and in which formats progress will be communicated to operational teams, senior leadership, governance tables and the public.</p> <p>Establish processes for sharing research findings and incorporating community feedback.</p>	1.3.3. 1.3.4. 1.3.5.	EN COM GOV RES STR

Actions	Description	Key activities	Priority	Skills*
	Strengthen oversight and capacity.	<p>Equip the governance table with the expertise and tools needed to fulfill its mandate effectively.</p> <p>Hire an independent expert with data system knowledge.</p> <p>Provide technical guidance and mentorship.</p> <p>Provide onboarding and capacity-building for all members focused on data literacy, governance principles and race-based data use.</p> <p>Ensure members are prepared to guide and evaluate data practices for the City of Toronto.</p>	<p>1.1.4.</p> <p>1.1.5.</p> <p>1.1.6.</p> <p>1.3.7.</p> <p>3.2.1.</p> <p>3.2.4.</p>	<p>CB</p> <p>EN</p> <p>GOV</p> <p>RES</p> <p>POL</p>
	Secure resources to support governance operations.	<p>Secure funding for the governance table, sub-committees and related initiatives.</p> <p>Allocate resources for honorariums, training and administrative support.</p>	<p>3.1.9.</p>	<p>BS</p>
Set clear terms of reference, period of meetings and table processes	Define the governance table's structure and operational model.	<p>Determine roles, responsibilities and decision-making processes.</p> <p>Consider a co-chair model for leadership, pairing a senior City employee with a community member advisor.</p> <p>Plan for staggered recruitment and ongoing adaptations to ensure diversity and inclusion.</p>	<p>1.3.1.</p> <p>1.3.2.</p> <p>1.3.5.</p> <p>1.3.7.</p> <p>3.2.1.</p>	<p>GOV</p> <p>POL</p> <p>STR</p>

Actions	Description	Key activities	Priority	Skills*
	Develop and formalize Terms of Reference.	<p>Outline key elements including:</p> <ul style="list-style-type: none"> • mandate, authority and responsibilities • accountability and decision-making processes • membership size and structure • leadership roles and chairing model • engagement terms and meeting frequency • honorariums and capacity-building needs <p>Revisit and refine Terms of Reference through community engagement activities.</p> <p>Ensure alignment with implementation goals.</p>	1.3.1. 1.3.2.	POL COM
Discuss and decide on data collection, analysis, use, management, and protections	Co-design ethical data guidelines with communities.	<p>Develop foundational principles for ethical data use that address:</p> <ul style="list-style-type: none"> • Embedding community voices in all stages of data development and decision-making • Using data to drive structural change and long-term impact. <p>Define both individual and collective data rights, especially for data collected that pertains to race and ethnicity.</p> <p>Define responsible use of race-based data that is aligned with the Black Community Data Governance Framework.</p>	1.3.6. 1.3.7. 3.2.1.	POL GOV ET RES

Actions	Description	Key activities	Priority	Skills*
	Strengthen data partnerships and expertise.	<p>Engage collaborators and knowledge holders to support equity-focused data initiatives for the Black community governance table.</p> <p>Leverage interdisciplinary expertise across professionals from public health, social work, urban planning, political science, computing and anthropology.</p> <p>Foster collaboration across institutions, academic teams and community organizations.</p>	1.2.2. 1.2.3. 1.3.4. 3.2.2. 3.2.4. 3.2.5.	PAR EN RES
Set a target for the impact of data use such as decreasing specific inequities	Identify priorities and begin planning to measure progress.	<p>Engage Black communities in setting priorities for personal information use, ensuring they reflect community-identified challenges and desired outcomes, such as:</p> <ul style="list-style-type: none"> • whether Black populations are benefiting from institutional services • if community members feel empowered to influence or lead interventions • how programs support community ownership and active participation <p>Analyze existing data to uncover disparities in access, outcomes and service experiences.</p> <p>Detect gaps in current data systems that limit visibility into inequities.</p>	1.1.3. 1.3.5. 3.1.3. 3.1.10. 3.2.3. 3.2.5. 3.3.1. 3.3.7.	EN GOV POL STR

Actions	Description	Key activities	Priority	Skills*
	Monitor progress.	<p>Set up systems for continuous monitoring and review of plans, data practices and community impact.</p> <p>Use findings to recommend corrective changes and refine interventions.</p> <p>Develop key progress reports to inform stakeholders and guide decision-making.</p>	<p>3.1.10.</p> <p>3.3.2.</p> <p>3.3.7.</p>	RES

*Refer to Appendix A for short-form definitions.

Phase 4: Supporting access

Bringing communities together and setting up a community governance table within the City's processes would mark a significant shift from conventional approaches to data governance. However, to allow meaningful decision-making, communities need to know what data exists and how it can be used.

Before expanding access externally, as explored in Phase 1, the City should first take stock of its own data holdings and processes. This includes clarifying what data is available, finding who within the institution holds authority to share, and defining roles and responsibilities related to the data. In Phase 4, institutional support is needed to build and implement processes supported by communities that enable data sharing. This will require investment in the City's technological infrastructure as well as the development of policies that guide and support responsible sharing.

Once internal systems are strengthened, the City can begin to look outward. This means sharing information about available data and exploring pathways to make it accessible to communities. To do this effectively, support should be provided to help communities conduct research and examine issues that matter to Black communities. At the same time, it cannot be assumed that individuals or community partners already have the capacity to work with data. Intentional investment is needed to build that capacity. This can help communities understand the potential impact of race-based data, how to apply it through research and what kinds of environments are needed to support this work.

The following actions have been outlined for this phase:

- Support community agencies that require information on community service use
- Partner with communities and support capacity-building training for local researchers
- Identify resources to facilitate community-based research
- Develop appropriate data access

Table 4. Actions and activities for Phase 4: Supporting access

Actions	Description	Key activities	Priority	Skills*
Support community agencies that require information on community service use	Promote open data access for community use	<p>Encourage use of open data platforms:</p> <ul style="list-style-type: none"> • Identify datasets that are relevant and accessible to community partners. • Promote awareness of available data resources and their potential applications. • Clarify data request processes • Share clear instructions for submitting data requests with guidance on eligibility, timelines and approval criteria. • Identify and respond to challenges experienced by community partners in accessing or using data. • Offer tailored support to navigate technical, legal or procedural hurdles. 	<p>1.1.7. 1.3.4. 1.3.7. 1.3.8. 3.2.5. 3.3.5.</p>	<p>COM PAR GOV POL</p>
	Embed equity into the tools and systems used for data sharing	<p>Evaluate and improve data tools, platforms and systems for ethical data practices based on Black community governance table perspectives.</p> <p>Prioritize user-friendly design and accessibility for diverse community users.</p>	<p>1.3.6. 1.3.8. 3.3.2. 3.3.4.</p>	<p>RES GOV IT</p>

Actions	Description	Key activities	Priority	Skills*
	Provide support services for data use	<p>Offer research assistance in partnership with post-secondary institutions, technical guidance and interpretation support to community partners.</p> <p>Facilitate training and capacity-building to strengthen data literacy and confidence.</p>	1.3.4. 1.3.8. 3.2.5.	CB EN PAR RES
	Improve data access structures and strategies	<p>Explore scalable access models, such as a community data platform for uploading, accessing and governing data, like a data trust, or formal data-sharing partnerships with clear oversight plans.</p> <p>Use interim strategies with community approval where ideal systems are not yet in place.</p>	1.3.4. 1.3.8. 2.3.1. 3.2.5.	GOV EN IT POL
Partner with communities and support capacity-building training for local researchers	Deliver community-centred data literacy training	<p>Offer data literacy sessions before or during engagement events.</p> <p>Provide clear, accessible information about data topics and their relevance.</p> <p>Tailor content to varying levels of experience and technical proficiency.</p> <p>Allocate time for post-event follow-up and continued dialogue.</p> <p>Include practical exercises in accessing, interpreting and applying data.</p>	1.1.4. 1.2.3. 3.2.4.	CB COM RES

Actions	Description	Key activities	Priority	Skills*
	Build capacity for community data use and access	<p>Offer training on data access procedures, ethical use and sharing protocols.</p> <p>Launch initiatives to reduce barriers to internet connectivity, devices and digital tools.</p>	<p>1.1.4.</p> <p>1.2.3.</p> <p>3.2.5.</p>	<p>CB</p> <p>COM</p>
	Empower communities to lead research and evaluation	<p>Enable communities to design and conduct evaluations that reflect their priorities.</p> <p>Provide tools and frameworks to track outcomes and guide future engagement.</p>	<p>1.1.4.</p> <p>1.2.3.</p> <p>1.3.4.</p> <p>1.3.8.</p> <p>3.2.5.</p> <p>3.3.6.</p> <p>3.3.7.</p>	<p>CB</p> <p>PAR</p> <p>RES</p>
Identify resources to facilitate community-based research	Standardize and share documentation	<p>Lead efforts to create and revise standard documents based on existing or external resources:</p> <ul style="list-style-type: none"> • Include templates for data collection, consent forms, sharing agreements, training materials and reporting formats. • Ensure materials are accessible to diverse audiences, including internal staff and the public. • Establish a centralized repository to organize and enable access to documents. • Collect feedback to identify gaps and improve templates for future use. 	<p>2.2.5.</p> <p>2.3.3.</p>	<p>GOV</p> <p>POL</p> <p>COM</p>

Actions	Description	Key activities	Priority	Skills*
	Provide support services for data use	<p>Offer research assistance in partnership with post-secondary institutions, technical guidance and interpretation support to community partners.</p> <p>Facilitate training and capacity-building to strengthen data literacy and confidence.</p>	1.3.4. 1.3.8. 3.2.5.	CB EN PAR RES
	Improve data access structures and strategies	<p>Explore scalable access models, such as a community data platform for uploading, accessing and governing data, like a data trust, or formal data-sharing partnerships with clear oversight plans.</p> <p>Use interim strategies with community approval where ideal systems are not yet in place.</p>	1.3.4. 1.3.8. 2.3.1. 3.2.5.	GOV EN IT POL
Partner with communities and support capacity-building training for local researchers	Deliver community-centred data literacy training	<p>Offer data literacy sessions before or during engagement events.</p> <p>Provide clear, accessible information about data topics and their relevance.</p> <p>Tailor content to varying levels of experience and technical proficiency.</p> <p>Allocate time for post-event follow-up and continued dialogue.</p> <p>Include practical exercises in accessing, interpreting and applying data.</p>	1.1.4. 1.2.3. 3.2.4.	CB COM RES

Actions	Description	Key activities	Priority	Skills*
	Build capacity for community data use and access	<p>Offer training on data access procedures, ethical use and sharing protocols.</p> <p>Launch initiatives to reduce barriers to internet connectivity, devices and digital tools.</p>	1.1.4. 1.2.3. 3.2.5.	CB COM
	Empower communities to lead research and evaluation	<p>Enable communities to design and conduct evaluations that reflect their priorities.</p> <p>Provide tools and frameworks to track outcomes and guide future engagement.</p>	1.1.4. 1.2.3. 1.3.4. 1.3.8. 3.2.5. 3.3.6. 3.3.7.	CB PAR RES
Identify resources to facilitate community-based research	Standardize and share documentation	<p>Lead efforts to create and revise standard documents based on existing or external resources:</p> <ul style="list-style-type: none"> • Include templates for data collection, consent forms, sharing agreements, training materials and reporting formats. • Ensure materials are accessible to diverse audiences, including internal staff and the public. • Establish a centralized repository to organize and enable access to documents. • Collect feedback to identify gaps and improve templates for future use. 	2.2.5. 2.3.3.	GOV POL COM

Actions	Description	Key activities	Priority	Skills*
	Develop scalable and secure technology infrastructure	<p>Evaluate and select appropriate Black community data governance systems for data management, access rights and institutional standards.</p> <p>Ensure compliance with legal and regulatory requirements.</p> <p>Engage internal and external partners to ensure usability.</p>	<p>2.3.1.</p> <p>2.3.3.</p> <p>3.2.5.</p> <p>3.2.6.</p>	<p>CBS</p> <p>GOV</p> <p>IT</p> <p>STR</p>
Develop appropriate data access	Define and operationalize data stewardship roles	<p>Appoint a dedicated staff member for oversight for each relevant dataset to lead access strategy and policy development.</p> <p>Require staff to formally hold specific roles for each dataset, such as data owners, stewards and custodians.</p> <p>Assess if roles are sufficient and appropriate, or if there are capacity-building needs, ensuring a balance between standardized structures and flexible approaches.</p> <p>Clarify roles of external partners either as ongoing contributors – requiring consistent governance protocols – or project-specific partners who are time-bound and require tailored agreements.</p> <p>Document roles in metadata and governance records</p> <p>Ensure responsibilities are documented and understood across teams.</p>	<p>1.3.2.</p> <p>2.1.2.</p> <p>2.1.4.</p> <p>3.2.3.</p>	<p>EN</p> <p>GOV</p> <p>POL</p> <p>COM</p>

Actions	Description	Key activities	Priority	Skills*
	<p>Establish legal infrastructure for data stewardship</p>	<p>Develop legal tools and agreements ranging from broad agreements to a firm commitment to Black community data governance (e.g. Letter of Intent or Memorandum of Understanding) to specific agreements for sharing individual datasets tailored to project scope and sensitivity (e.g. Data Sharing Agreements for identifiable linkages, Data Use Agreement and Data Use License for de-identified data access).</p> <p>Identify decision-makers for legal agreements.</p> <p>Clarify legal authority of datasets based on role to the dataset (e.g. owner or steward), rather than job title.</p> <p>Consider including these components in agreements:</p> <ul style="list-style-type: none"> • stakeholder roles in collection, processing and analysis • intended data use and sharing mechanisms • how community governance influences agreements • approval rights for external requests • intellectual property, publication and attribution protocols <p>Conduct scans for best practices, developing modular templates with flexible appendices.</p> <p>Invest in plain language versions and public access to agreements.</p>	<p>1.3.7. 2.2.4. 3.2.1. 3.2.2.</p>	<p>COM EN GOV LEG POL STR</p>

Actions	Description	Key activities	Priority	Skills*
		<p>Standardize legal processes across the data lifecycle from approvals for new agreements, tracking amendments and notifying stakeholders, revisiting terms during negotiation when scope or sensitivity changes, or terminating agreements.</p>		
	<p>Design ethical data access protocols with the Black community governance table</p>	<p>Differentiate access pathways between internal access, covering City departments and internal teams, and external access for researchers, community partners and other stakeholders.</p> <p>Develop a scoring rubric to evaluate race-based data projects based on community values.</p> <p>Explore decision-making based on strategic value, such as urgent public interest, time-sensitive funding or pandemic response.</p> <p>Develop external request forms asking for pertinent information, such as the research question and data plan, timeframe, community of interest, evidence of alignment with community priorities and equity goals, and required data elements.</p> <p>Align access with community priorities by:</p> <ul style="list-style-type: none"> • Identifying indicators that reflect community-defined problems. • Setting criteria for appropriate data use based on community needs. 	<p>1.2.3.</p> <p>1.3.8.</p> <p>2.3.1.</p> <p>3.2.5.</p> <p>3.3.4.</p>	<p>EN</p> <p>GOV</p> <p>PAR</p> <p>IT</p> <p>RES</p> <p>STR</p>

Actions	Description	Key activities	Priority	Skills*
	Secure long-term resources	<p>Allocate resources for engagement, training, infrastructure and licensing.</p> <p>Align budgets with the scale and importance of community data work.</p> <p>Strengthen relationships with data partners to foster shared ownership of data initiatives with feedback loops to improve access and use based on input.</p>	3.1.9.	BS PAR STR

*Refer to Appendix A for short-form definitions.

Phase 5: Ensuring protections

Providing access to data and decision-making power should not be understood as having unlimited or unrestricted authority. This misconception is the basis of many concerns communities have raised about institutional control and use. These same concerns underscore the need for a community governance table. However, the integrity of the table's decisions depends on the understanding that race-based data will be used in ways that actively protect communities from harm.

To support this, the City should work in partnership with the community governance table to identify the safeguards necessary for anyone who interacts with race-based data, whether through collecting, sharing or storage, and whether the data is identifiable, de-identified or anonymized. The City's internal environment should reflect the table's mandate and show a clear commitment to implementing its decisions wherever possible. In parallel, there should be long-term efforts to explore strategies that enable community-level consent and control, thereby moving beyond the individual-focused frameworks that current regulations tend to rely on.

Once the table's priorities around safeguards are set up, the next step is to embed them within the City's organizational, policy and technological structures. This includes building systems that ensure the security of race-based data regardless of where it lives or whether it is static or in transit. Control over data should not be compromised through the processes of sharing or use.

With safeguards in place, attention should turn to the criteria for access. Deciding who should be entrusted with race-based data, and under what conditions, requires the development of both general principles and case-by-case decision-making processes. These decisions should not rely solely on communities. Legal, technical, cybersecurity and policy experts should be engaged to support communities in finding potential risks and developing strategies for protection.

Even when data is shared with trusted parties, accountability stays important. Mechanisms should be set up to flag inappropriate use and to monitor issues through active processes such as audits. While no system can guarantee complete safety, proactive planning can ensure that incidents are addressed transparently and constructively. These processes should be informed by both the community governance table and broader community engagement. If challenges arise, they should not come as a surprise. Communities should already have decided that the benefits of using race-based data as well as the safeguards in place make the risks acceptable.

Staff cannot be expected to navigate these new processes without support. Targeted training is necessary to ensure that race-based data is used responsibly and effectively, with Black communities in mind. Staff should be equipped to identify and apply best practices both proactively and in response to issues. They should understand the full scope of processes – from race-based data analysis and interpretation to knowledge mobilization – that allow race-based data to build trust and drive meaningful change.

As such, the following actions have been outlined for this phase:

- Implement governance table guidelines on the use of data
- Identify opportunities to safeguard the data
- Identify balancing access and proper use for those who need data
- Identify strategies to find inappropriate data use
- Identify how to build training to improve the quality of data use and protections
- Develop strategies for data and data use transparency such as public reporting

Table 5. Actions and activities for Phase 5: Ensuring protections

Actions	Description	Key activities	Priority	Skills*
Implement governance table guidelines on the use of data	Develop community-level protections of data	<p>Explore key ethical concerns regarding the ways communities may be harmed through data practices.</p> <p>Clarify the specific data practices (e.g. collection, linkage, sharing, modeling, use) and sectors (e.g. healthcare, social services, housing).</p> <p>Examine gaps in individual protections at the institutional, regulatory and legislative levels that leave these concerns unaddressed.</p> <p>Investigate strategies to strengthen community-level safeguards against identified or prioritized harms, while ensuring compliance with mandatory rules.</p>	<p>1.1.5.</p> <p>1.1.6.</p> <p>1.2.3.</p> <p>1.2.4.</p> <p>1.2.6.</p> <p>1.3.6.</p> <p>2.3.2</p> <p>3.2.1.</p> <p>3.2.2.</p> <p>3.2.6.</p>	<p>ET</p> <p>GOV</p> <p>POL</p>
	Establish community-centred data policies	<p>Review municipal data ethics practices from other cities that centre equity.</p> <p>Adapt these practices to Toronto’s local context and the Black Community Data Governance Framework.</p> <p>Review existing and proposed policies, governance structures and privacy frameworks to ensure alignment with Black community data governance principles.</p> <p>Create new policies or adapt existing policies for data design, collection, analysis, interpretation and use that reflect community needs and governance principles covering:</p>	<p>1.2.6.</p> <p>2.2.4.</p> <p>2.3.2.</p> <p>3.2.2.</p> <p>3.2.6.</p> <p>3.2.7.</p>	<p>EN</p> <p>GOV</p> <p>POL</p> <p>STR</p> <p>RES</p>

Actions	Description	Key activities	Priority	Skills*
		<ul style="list-style-type: none"> • researchers using the data equitably • compliance standards and monitoring plans • approval workflows for projects involving Black community data • thresholds for appropriate access • repurposing, selling or sharing of data, including with government agencies • community consent and data rights • ethics in data process design and implementation • equity and bias audits with data use and reporting 		
	Empower community control and consent mechanisms	<p>Create community-driven consent processes, ensuring informed, voluntary consent that can be withdrawn at any time.</p> <p>Develop policies that affirm the right to services regardless of consent, rights to explanation, contestation and remedy when harm occurs.</p> <p>Provide mechanisms for communities to determine who can access their data.</p>	1.3.2. 1.3.5. 3.2.1. 3.2.2. 3.2.3.	GOV IT POL RES

Actions	Description	Key activities	Priority	Skills*
Identify opportunities to safeguard the data	Establish oversight of sensitive data for Black communities	<p>Identify datasets that contain sensitive information as determined by communities (e.g. race-based identifiers, community safety, shelter use).</p> <p>Involve the Black community governance table to decide on access and protection protocols.</p>	<p>1.3.1.</p> <p>1.3.2.</p> <p>1.3.5.</p> <p>1.3.6.</p> <p>3.2.1.</p> <p>3.2.2.</p> <p>3.2.3.</p>	<p>ABR</p> <p>ET</p> <p>GOV</p> <p>RES</p> <p>POL</p>
	Implement metadata standards for community data management	<p>Embed mechanisms to identify and manage race-based data separately.</p> <p>Define standard metadata elements (e.g., dataset purpose, source, author, licensing).</p> <p>Document risk levels, consent provisions and inappropriate use categories.</p> <p>Link metadata to governance roles to enable monitoring of decisions made on datasets.</p> <p>Implement tools and systems that allow communities to manage and review metadata.</p> <p>Ensure that metadata travels with data across systems to maintain protections and context.</p> <p>Specify compatible systems.</p>	<p>2.3.2.</p> <p>3.2.1.</p> <p>3.2.2.</p> <p>3.2.3.</p>	<p>ABR</p> <p>ET</p> <p>IT</p> <p>STR</p>

Actions	Description	Key activities	Priority	Skills*
	Strengthen technical infrastructure for race-based data protections	<p>Secure data access and transfer through mechanisms such as:</p> <ul style="list-style-type: none"> • multi-factor authentication and role-based access controls • industry-standard encryption and de-identification protocols • specify approved platforms, APIs and software for secure exchange <p>Develop protocols for remote versus internal access, and desktop versus mobile environments.</p> <p>Ensure infrastructure accommodates all types of required data (e.g. quantitative, qualitative, imaging, video).</p> <p>Develop policies focused on boundaries for ethical open data use.</p>	2.3.1. 2.3.3. 3.2.3. 3.2.6.	CBS IT POL

Actions	Description	Key activities	Priority	Skills*
Identify balancing access and proper use for those who need data	Build multi-step review processes	<p>Engage a network of experts involving internal staff, external researchers and community partners throughout the data lifecycle.</p> <p>Establish clear checkpoints for stakeholder engagement.</p> <p>Document roles and expectations of community participation in decision-making.</p> <p>Conduct reviews for data use across numerous domains:</p> <ul style="list-style-type: none"> • Community governance review to ensure alignment with problem statements or scoring rubrics co-developed with communities. • Legal review to ensure jurisdictional and institutional compliance. • Research ethics to evaluate appropriateness of objectives, indicators, analytic methodologies and ethical concerns. • Technical and security review to assess data sensitivity, quality, volume and safeguards. • Policy reviews to ensure alignment with City strategies and goals. • Data owner review to confirm authorization by designated data owner. 	<p>1.3.1.</p> <p>1.3.2.</p> <p>1.3.4.</p> <p>1.3.5.</p> <p>2.1.3.</p> <p>2.2.1.</p> <p>2.2.4.</p> <p>3.1.6.</p> <p>3.2.1.</p> <p>3.2.2.</p> <p>3.2.3.</p> <p>3.3.2.</p>	<p>GOV</p> <p>EN</p> <p>LEG</p> <p>RES</p> <p>POL</p> <p>STR</p>

Actions	Description	Key activities	Priority	Skills*
		<p>Ensure these reviews are coordinated by a central team (e.g. data governance working group or executive committee) to compare findings, communicate discrepancies and align decisions from all reviews.</p> <p>Require formal approval from the governance table for external data access.</p> <p>Develop processes to prepare and release data based on purpose and risk.</p> <p>Apply additional safeguards for highly sensitive data.</p> <p>Determine whether analysis should occur in-house or externally.</p>		
	Align data use with decision-making needs	<p>Determine appropriateness of collecting new (primary) data or using existing (secondary) data through data mapping exercises.</p> <p>Document rationale, methods and privacy-preserving practices when linking datasets.</p> <p>Evaluate need for data based on timeliness.</p> <p>Align data acquisition, analysis and reporting with decision-making windows, such as funding opportunities or policy cycles.</p>	<p>1.3.5.</p> <p>2.2.1.</p> <p>3.2.1.</p> <p>3.2.2.</p> <p>3.2.3.</p> <p>3.3.3.</p>	<p>EN</p> <p>ET</p> <p>GOV</p> <p>POL</p> <p>STR</p>

Actions	Description	Key activities	Priority	Skills*
Identify strategies to find inappropriate data use	Build a multi-layered data security framework	<p>Develop a security plan covering:</p> <ul style="list-style-type: none"> • technical components (e.g. encryption, physical protection, backups and system maintenance) • procedural components (e.g. legal safeguards, reporting mechanisms, breach response protocols) • human components (e.g. defined roles, staff training and accountability structures) <p>Define data retention, archival and disposal policies.</p> <p>Establish a dedicated data security team to monitor and protect datasets relevant to Black community data governance.</p>	2.3.1. 2.3.2. 2.3.3. 3.2.6. 3.2.7.	CBS IT POL
	Conduct routine audits and risk assessments	<p>Engage technical experts and communities to assess practices.</p> <p>Review whether data sharing, linkage and storage practices mitigate harm, especially for smaller population groups within Black communities.</p> <p>Evaluate whether they contribute to or reduce distrust in government.</p> <p>Identify gaps in safeguards and recommend improvements.</p>	3.2.6.	CBS IT POL

Actions	Description	Key activities	Priority	Skills*
	Strengthen breach response and incident reporting protocols for race-based data	<p>Define clear steps for containment, investigation and resolution of breaches of sensitive data for Black communities.</p> <p>Develop notification procedures for Black communities and affected stakeholders.</p> <p>Create accessible monitoring tools to detect and report anomalies, breaches and misuse.</p>	3.2.6.	CBS IT POL STR
Identify how to build in training to improve the quality of data use and protections	Establish data quality standards	<p>Set clear goals on data quality for race-based data initiatives aligned with organizational priorities, project objectives and community input.</p> <p>Develop a data quality management plan, including:</p> <ul style="list-style-type: none"> • roles and responsibilities • workflows for maintaining, reviewing and improving data quality • accountability mechanisms to ensure compliance <p>Conduct data quality audits evaluating accuracy, completeness, availability, documentation, standardization and bias.</p> <p>Test data quality standards with external teams to uncover hidden issues, using feedback to improve documentation and data quality.</p> <p>Ensure validation of data quality before data use.</p> <p>Revisit quality benchmarks to reflect evolving contexts.</p>	1.3.6. 2.3.3. 3.2.1. 3.2.2.	COM IT RES PAR POL STR

Actions	Description	Key activities	Priority	Skills*
Identify strategies to find inappropriate data use	Implement training programs for equitable data use	<p>Train data collectors and users the importance of race-based data in reducing disparities.</p> <p>Communicate where and how data will be stored, who will access it, and what protections are in place.</p> <p>Develop training modules focused on data literacy, ethical management and equity-centred analysis for stakeholders as well as on:</p> <ul style="list-style-type: none"> • identifying indicators and optimal values • selecting appropriate statistical tests based on data structure and characteristics • assessing datasets for traditional and equity-focused biases • integrating qualitative data to explain structural contributors to inequities • visualizing data to communicate information in accessible ways <p>Tailor content to various roles, including collectors, analysts and decision-makers.</p>	<p>1.1.4.</p> <p>1.2.3.</p> <p>2.1.4.</p> <p>3.1.8.</p> <p>3.2.4.</p> <p>3.3.3.</p>	<p>CB</p> <p>COM</p> <p>EN</p>

Actions	Description	Key activities	Priority	Skills*
Develop strategies for data and data use transparency such as public reporting	Define and standardize variables	<p>Define race and other key variables consistently across datasets.</p> <p>Co-create a common vocabulary with communities across sectors and teams.</p> <p>Address concepts defined by multiple terms (e.g., “unhoused people” vs. “people experiencing homelessness”).</p> <p>Address terms defined by multiple concepts (e.g., “self-reported race” vs. “provider-assigned race”).</p> <p>Document how variables are collected, processed, linked and merged.</p>	<p>1.1.4.</p> <p>1.1.6.</p> <p>1.2.3.</p> <p>2.3.2.</p> <p>2.3.3.</p>	<p>GOV</p> <p>IT</p> <p>COM</p> <p>RES</p>
	Embed equity-focused analytical practices to reduce harm	<p>Develop a plan for community oversight and protection related to the analysis of data by internal and external partners with an explicit equity-focused lens.</p> <p>Ensure research plans are transparent and outline chosen methods, rationale, limitations and intended goals for both technical and non-technical audiences.</p> <p>Ensure the disaggregation of data by race and other intersectional identities while maintaining privacy at individual, family, neighbourhood and population levels.</p> <p>Select and justify analytical methods for race-based data based on collaborations with multi-disciplinary researchers and community stakeholders.</p>	<p>1.3.6.</p> <p>2.3.2.</p> <p>3.2.4.</p> <p>3.3.3.</p> <p>3.3.4.</p>	<p>ABR</p> <p>ET</p> <p>EN</p> <p>GOV</p> <p>POL</p> <p>RES</p>

Actions	Description	Key activities	Priority	Skills*
	Promote community-centred interpretation	<p>Engage communities, providers and policymakers through participatory techniques in reviewing and interpreting data.</p> <p>Integrate community-informed stories and experiences in the interpretation of data.</p> <p>Ensure interpretation challenges harmful narratives and promotes systemic change.</p> <p>Contextualize race-based data within broader social, economic and structural factors.</p>	<p>1.1.4.</p> <p>3.3.1.</p> <p>3.3.2.</p> <p>3.3.3.</p> <p>3.3.4</p>	<p>ABR</p> <p>ET</p> <p>EN</p> <p>GOV</p> <p>PAR</p> <p>POL</p> <p>STR</p>
	Communicate findings in accessible and transparent ways	<p>Use reports, dashboards, maps, scorecards and presentations tailored to audience needs.</p> <p>Develop plain language summaries that simplify complex analyses.</p> <p>Develop a communication strategy with key messages, target audiences and channels for dissemination.</p> <p>Establish regular reporting processes through internal data governance structures.</p>	<p>1.1.7.</p> <p>1.3.8.</p> <p>3.3.3.</p> <p>3.3.5.</p> <p>3.3.6.</p>	<p>EN</p> <p>COM</p> <p>POL</p>
	Document and share data use practices across divisions	<p>Record decisions, processes and outcomes related to race-based data use.</p> <p>Include context such as funding sources, partnerships and governance structures.</p> <p>Identify drivers and barriers to effective data use.</p> <p>Use findings to inform future strategies and improve transparency.</p>	<p>2.2.1.</p> <p>2.2.5.</p> <p>2.3.3.</p> <p>3.1.10.</p> <p>3.3.7.</p>	<p>COM</p> <p>RES</p> <p>POL</p> <p>STR</p>

*Refer to Appendix A for short-form definitions.

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Appendix A: Skills framework

Core skills and competencies were recorded from relevant initiatives identified from the literature. These were summarized in Table 6, which also included descriptions of these skills in the context of the Black Community Data Governance Framework.

Table 6. Skills framework

Skills	Description
Anti-Black racism (ABR)	<ul style="list-style-type: none"> • Expertise in identifying social determinants of health • Skills in analyzing systemic disparities and applying data to advance equity • Cultural competency and a deep understanding of systemic anti-Black racism • The ability to communicate using inclusive, accessible language • A commitment to ethical data use, including respect for collective privacy • Strong community engagement practices that centre Black voices
Business (BS)	<ul style="list-style-type: none"> • Advocate for, secure, and steward financial resources • Build financial models that support both current programs and future growth • Collaborate across departments to align funding strategies • Understand internal funding mechanisms and external opportunities
Capacity building (CB)	<ul style="list-style-type: none"> • Supporting foundational data literacy and digital access for Black communities • Explaining complex data concepts in accessible formats • Teaching practical software skills • Connecting data use to equity and systems change • Designing inclusive learning programs for sta • Creating infrastructure that supports long-term skill development and readiness

Skills	Description
Communications (COM)	<ul style="list-style-type: none"> • Craft clear, accessible messaging for diverse audiences • Develop materials across formats, such as emails, posters, social media, reports • Use digital tools and platforms effectively • Tailor strategies to different engagement contexts • Ensure consistent messaging across internal teams and external partners
Cybersecurity (CBS)	<ul style="list-style-type: none"> • Understand privacy laws and data security protocols • Manage access controls and develop protective policies • Conduct risk mitigation and auditing • Identify vulnerabilities before they escalate • Maintain stability across technical, legal and operational dimensions
Engagement (EN)	<ul style="list-style-type: none"> • Facilitate inclusive, trauma-informed events and dialogues • Communicate transparently and with cultural humility • Support long-term involvement, especially around anti-Black racism and municipal governance • Identify strong community partners and foster shared problem-solving
Ethics (ET)	<ul style="list-style-type: none"> • Navigating complex dilemmas at the intersection of policy, privacy and community needs • Designing informed consent processes and facilitating sensitive conversations • Critically examining power, surveillance and trust • Establishing confidentiality protocols and responsible data use frameworks • Interpreting data with care and aligning practices with community well-being

Skills	Description
Governance (GOV)	<ul style="list-style-type: none"> • Understand municipal systems, leadership structures and decision-making processes • Shape policy, build internal capacity and balance competing priorities • Secure operational and financial resources to sustain long-term efforts • Lead with institutional credibility and cross-departmental influence • Use risk governance principles to identify and monitor strategic, operational, financial, technological, reputational and community-based risks
Information technology (IT)	<ul style="list-style-type: none"> • Develop and maintain scalable, secure data systems • Ensure reliable storage, sharing and access across divisions and partners • Understand the City's technological landscape and its limitations • Guide digital planning and policy based on realistic infrastructure assessments • Apply knowledge of digital transformation, data science and emerging technologies • Address equity-related challenges tied to access, surveillance and systemic exclusion
Legal (LEG)	<ul style="list-style-type: none"> • Ensures compliance with legislation, regulatory frameworks and human rights standards. • Interpreting evolving legal and policy directions • Clarifying roles and responsibilities across departments • Supporting transparent decision-making • Crafting agreements for ethical data sharing • Embedding equity in both policy and practice • Addressing legal risks and protecting community interests

Skills	Description
Partnership (PAR)	<ul style="list-style-type: none"> • Building relationships with community organizations, researchers and policy experts • Facilitating ongoing dialogue through formal and informal channels • Convening diverse stakeholders at public events and governance tables • Navigating institutional systems to enable cross-departmental collaboration
Policy (POL)	<ul style="list-style-type: none"> • Design ethical, enforceable policies for data collection, sharing and storage • Create frameworks that support sustained community engagement and funding • Align policies with Black data governance principles and institutional standards • Tailor policy for diverse audiences from City Council to internal teams and external partners • Use policy as a tool for structural change and consistent documentation
Research (RES)	<ul style="list-style-type: none"> • Be proficient in quantitative and qualitative analysis • Apply culturally aware, equity-centred methodologies • Interpret sociodemographic data responsibly and transparently • Design studies that reflect community priorities and avoid reinforcing bias • Communicate findings clearly and produce actionable recommendations
Strategy (STR)	<ul style="list-style-type: none"> • Institutional design and policy-making processes • Mechanisms for change across all levels of government • Program development and stakeholder alignment • How to translate data insights into tools like reports, dashboards and advocacy materials • Navigate complex political landscapes • Build trust with municipal leadership • Advocate for policy shifts and resource allocation • Facilitate dialogue between communities and decision-makers • Connect initiatives to broader civic goals and evolving priorities

Appendix B: Performance measures

To support the implementation and long-term sustainability of the Black Community Data Governance Implementation Plan, it is necessary to measure and keep track of different aspects of the implementation process. Collecting data serves as a tool for reflection on the overall success of the project and its alignment with its intended goals.

Evaluation of the Black Community Data Governance Implementation Plan will also support future decision-making and provide rationale for making changes. It also facilitates the identification of gaps in process and elucidates the short-, medium- and long-term impacts of the implementation plan.

There are various types of evaluation and measurement but the most common are process measures, outcome measures and economic measures. Process measures focus on the activities and processes related to the planning or delivering of an action or process. This includes how goals were achieved and important lessons learned. Process measures ask questions like, how is the action being implemented, are intended users being reached, have the appropriate processes for implementation been followed?

Outcome measures evaluate whether the action met the intended results that it aimed to achieve. It focuses on understanding the results of the implementation. Potential questions include, how did the implementation plan improve [a target aim], what was the influence of the implementation plan and did the plan lead to improvements in the medium and short term?

Economic measures assess the economic impact of the plan, particularly if it has led to cost savings and improved efficiency. Questions include, does the plan provide economic value and is it a good use of economic resources?

Information collected to answer these questions can come in many forms, and data can be both quantitative (numerical) or qualitative (non-numerical).

In this section, sample measures for each phase of the Implementation Roadmap have been included. These serve as a starting basis to define what measures are needed to track and monitor progress. These sample questions should not be viewed as a comprehensive summary of all possible measures and instead as an instructive starting point for a more fulsome evaluation plan. To facilitate reflection, we have also included questions that can guide considerations around how the plan aligns with the goals of each phase.

Phase	Outcome	Sample Quantitative Measures	Sample Qualitative Measures	Sample Reflection Questions
Organizational Agreement and Readiness	Organizational support of implementation plan	<p>Perceptions of organizational readiness (process)</p> <p>Community perceptions on the development of community-driven vision (process)</p> <p>Review of objectives for alignment with organizational vision and goals (process)</p>	<p># of divisions involved in early implementation phases (process)</p> <p># of touchpoints with organizational leadership (process)</p> <p># capacity-building trainings for employees (outcome)</p>	<p>Are priorities embedded into policy and practice?</p> <p>Is the overall vision shared and reinforced across divisions and partners?</p> <p>How are ethics and data principles reinforced across the organization?</p>
Community Engagement	Community perspective is reflected and incorporated into the implementation of Black data governance	<p>Sentiment analysis of community members favourability of the implementation's goals and priorities (outcome)</p> <p>Improved partnerships and relationships with community (through interviews) (outcome)</p> <p>Activities led to the identification issues relevant to community (outcome)</p>	<p># of facilitations held with community members (process)</p> <p># of communications shared with the public and metrics on uptake (process)</p> <p># of strategic priorities co-developed with community partners (outcome)</p>	<p>Is the engagement plan responsive to community concerns?</p> <p>Are marginalized voices clearly represented in the action's goals, aims and vision?</p> <p>Are strategic priorities being publicly communicated and documented?</p>

Phase	Outcome	Sample Quantitative Measures	Sample Qualitative Measures	Sample Reflection Questions
Community Governance Tables	Establishment of Black Community Data Governance Table to influence policy and practice	<p>Review of developed policies and practices for intended impact (outcome)</p> <p>Community governance table member perspectives on the table's impact and reach (outcome)</p> <p>Increased legislative support for Black community governance of data (outcome)</p>	<p># of members onboarded to the Black Community Data Governance Table (process)</p> <p># of meetings or convenings held with the Black Community Data Governance Table (process)</p> <p>Dollars earmarked for Black Community Data Governance Table activities (economic)</p>	<p>Has the Black Community Data Governance Table been appropriately resourced?</p> <p>What should be the terms of appointment?</p> <p>Does the Black Community Data Governance Table have the necessary capacity and power to enact changes?</p> <p>Have they signed on to the administrative structure of the Black Community Data Governance Table?</p> <p>Are policies transparent, monitored for compliance?</p> <p>Do they foster accountability?</p>

Phase	Outcome	Sample Quantitative Measures	Sample Qualitative Measures	Sample Reflection Questions
Supporting Access	Implementation of infrastructure to support the uptake of data governance processes and increased data use	<p>Review of development policies and practices around data use (process)</p> <p>Qualitative analysis of the user experience of technological tools (process)</p> <p>Review of resources intended to standardize data collection and documentation (process)</p>	<p># of City divisions that have applied relevant policies and practices (outcome)</p> <p># of community organizations that report increased access of City-derived data (outcome)</p> <p># of staff members involved in Black data governance implementation and outreach (process)</p>	<p>Are equitable data-sharing structures (trusts or partnerships) implemented and sustained?</p> <p>Has community agency and contribution to governance been effectively evaluated?</p> <p>Have partnerships been established with key organizations who may benefit from data access to data?</p>
Ensuring Protections	Increase control over process related to data collection, storage and use	<p>Review of legal compliance of datasets (process)</p> <p>Review of access pathways for external partners to use data (process)</p> <p>Community perceptions of data safety measures taken by the City (outcome)</p>	<p># of legal, regulatory and compliance policies and procedures developed (process)</p> <p># of attempted data breaches prevented (outcome)</p> <p>Budget to ensure sustainability of protective actions related to data (economic)</p>	<p>Have restrictions on data use been enforced, and is informed consent properly obtained?</p> <p>Have clear ethical and anti-racist policies and practices been developed and implemented?</p> <p>Have specific training requirements for data collectors and users been clearly identified?</p>

Appendix C: Implementation Tool

The previous sections of this implementation plan have provided background with the necessary context for Black data governance. Equipped with this background information, it is now possible to begin applying that knowledge in a real-world setting.

The following Implementation Tool can be used to plan and map out all the key considerations and tasks necessary to successfully implement your action. The tool is informed by the objectives defined in the implementation plan, the Implementation Roadmap and evidence from the literature review conducted in the first phase of the project⁴⁻⁷. While the Implementation Tool is designed to move you through the implementation process, in the initial phases (e.g., Plan, Vision, Assess), it is not required to complete them linearly. Instead, you should begin by filling out the aspects of your action that you know and identify any gaps in your knowledge. The Implementation Tool is designed to be iterative so you may return to a section when you have more context about what is necessary to successfully implement your action.

The steps and subsections of the Implementation Tool include:

- Plan
 - Plan details
 - Project team
 - Implementation support
- Vision
 - Reflect
 - Key tasks and deliverables
- Assess
 - Understanding
 - Resources
 - Readiness
 - Engagement
- Action
 - Core activities
 - Key tasks and deliverables
 - Communicate
- Review
 - Performance measures
 - Plan for optimization

The Plan section of the tool sets out the elements of the action. It includes basics such as plan details, documenting the core project team and the broader supports needed to assist with implementation. The Vision section of the tool asks the user to reflect on key considerations that can be overlooked in the planning process and to understand the intent behind the action. It also sets the stage for detailing key tasks and deliverables. The Assess section encourages the user to consider and reflect on their knowledge, the resources needed, the organization's readiness to implement the action and any engagement needed to solidify the action's purpose. The Action section is the core of the tool, particularly the Core Activities subsection. This step takes the user through what is needed to mobilize the action, including understanding the core activities related to implementation, refining the action's key tasks and deliverables and drafting a plan for communication. The final step focuses on measuring and evaluating the action so that it can be optimized for longevity and impact.

Plan

The purpose of this section is to begin the planning of the action. This section is comprised of three subsections: Details, Project Team and Implementation Support. Some of this information would already be defined at the outset of the project, while other aspects may become clearer as the action planning matures.

Tip: You may want to begin by filling out what pieces are already known and then continuing to the other series to finalize the ideation of the action.

Plan: Details	
What are the details of the plan?	
Details	Response
Implementation Start Date	
Proposed Implementation End Date	
Implementation Lead (Name, role, email, phone)	
Lead Division	
Other Divisions Engaged	
Stakeholders (Communities, organizations, institutions, etc.)	

Plan: Project Team

Who will contribute to the implementation of the action?

Role What are the necessary roles of the core project team?	Description Provide a short description.	Responsibilities What are the roles responsible for?	Skills What skills do they need to possess?	Accountability Who is this role accountable to?

Plan: Implementation Support

What entities will support implementation of the action?

<p>Skills What type of knowledge is needed to support the implementation of this action? Refer to Appendix A to find examples of skills that may be relevant to this subsection.</p>	<p>Role What role(s) are needed to support the implementation of this action?</p>	<p>Responsibilities What are these roles responsible for?</p>
Leadership		
Administrative Support		
Technology Services		
Legal Services		
Community Perspective	Black Community Data Governance Table	
Other		

Vision

The Vision section focuses on a deeper ideation of the proposed action. Three subsections comprise the section: Reflect and Key Tasks and Deliverables.

Reflect encourages reflection around the purpose and vision of the action as well as the potential impacts of the action. At the end of this step, the user is encouraged to draft initial key tasks and deliverables to root the action. Later in the Implementation Tool, these key tasks and deliverables will be refined.

Vision: Reflect		
Details	Response	Notes
<p>Description Describe your action. What is it? A program, policy, intervention, service or strategy? What are the main aims of this action?</p>		
<p>Vision Why is this action needed? What gap or need does it address? What is the expected outcome of this action? What do you intend for it to do? What are the intended benefits?</p>		
<p>Timeline What is the overall timeline for completion?</p>		
<p>Beneficiaries Who do you expect to benefit from this action? (divisions, communities, organizations, institutions, etc.)</p>		
<p>Goal Create a clearly defined goal for this action. Description of the goal should be specific, achievable, relevant and time-bound (measures will come later) *You may want to complete the other tables before returning to this box.</p>		

Vision: Key tasks and deliverables

What are the key tasks and deliverables that need to be taken to implement this action?

Key tasks and deliverables will be refined further. You may find yourself coming back to refine these as you move through the plan in an iterative fashion.

Key deliverables	Key tasks	Notes

Assess

The Assess section asks the user to reflect on their understanding of the action to reflect on considerations for implementation. It also directs the user to consider the resources necessary for implementation and to determine the organization’s readiness for implementation. There are four subsections: Understanding, Resources, Readiness and Engagement.

Assess: Understanding	
Details	Response
<p>Gaps</p> <p>What gaps in our collective knowledge exist? What do we already know that we need to learn more about?</p>	
<p>Information Gathering</p> <p>What information do you need to gather to make the action successful?</p> <p>What previous work has already been completed?</p>	
<p>Engagement</p> <p>Which members of the communities should you engage to understand more about the action and desired outcomes?</p>	
<p>Limiting Factors</p> <p>What potential barriers exist might hinder a successful implementation of this action?</p> <p>What steps or strategies will you employ to address these barriers?</p>	

Assess: Understanding

Details	Response
<p>Ethical Impact Consider the ethical ramifications of the action. What are the implications for anti-Black racism, sexism, xenophobia and other forms of discrimination?</p> <p>Have you considered the impact of intersectional forms of oppression?</p> <p>What specific actions will you take to maximize the potential for positive impacts and/or to mitigate the negative impacts of the action?</p> <p>Have you considered the impacts of technological and digital literacy this action?</p>	
<p>Legal Impact Consider the legality of the proposed action, particularly as it relates to data use. Consider the type of data used and the necessary privacy protections required to legally implement the action.</p>	
<p>Other What other impacts may exist?</p>	

Assess: Resources

What resources are needed to support the implementation of the project?

Details	Response	Notes
Financial Resources What financial resources are necessary to support the action (e.g., budgets, honorariums)?		
Technological Resources What technological resources are necessary to support the action (e.g., data systems)?		
Legal Resources What legal resources are necessary to support the action?		
Contractor(s) What contractors are needed to support the action?		
Training What training resources are needed to support the action?		
Measurement What evaluation and measurement supports are needed to support the action (e.g., internal or external evaluator)?		

Assess: Readiness

Are the necessary elements in place to support the action?

If steps need to be taken to ensure readiness, add them to the key tasks and deliverables.

Element	Response (Are the elements in place? Describe)	Next steps (What needs to happen and who will do it?)
People		
<p>Leadership Is there a clear link between the implementing team and leadership?</p>		
<p>Staffing Describe the process in place to recruit staff to deliver the action. Identify any training necessary to implement the action. Are there adequate staff to successfully implement the action? If coaching is necessary, describe the coaching and supervision that will need to take place.</p>		

Assess: Readiness

Are the necessary elements in place to support the action?

If steps need to be taken to ensure readiness, add them to the key tasks and deliverables

Element	Response (Are the elements in place? Describe)	Next steps (What needs to happen and who will do it?)
Organizational Infrastructure		
Data Systems Are there data requirements to support the implementation of the action Does the City have the required data systems to support the action? What are they? Have the necessary technological support been engaged?		
Administrative Support Is there adequate administrative support to implement the action? What are they?		
Other Resources		
Other What other resources are needed to address the key tasks and deliverables?		

Assess: Engagement

What engagement needs to occur to understand community concerns, needs and desires? With whom?

<p>Stakeholders Which members of the communities should you engage to understand more about the action and desired outcomes? Detail how many people in each stakeholder type should be engaged.</p>	<p>Black Community Governance Table Community organization partners</p>
<p>Engagement How should stakeholders be engaged (interviews, focus groups, facilitation sessions, etc.)?</p>	
<p>Purpose Why are you engaging with these specific groups? What information do you want to learn?</p>	
<p>Partnerships What potential partnerships exist with community members or organizations that would support the widespread uptake of the action?</p>	

Action

The Action step is where the implementation is mobilized. In this step, the user is guided through the necessary steps for setting the action in motion at the beginning, middle and end of the process. This section draws on the previous steps to bring together the necessary information to begin setting the action in motion. It has three subsection: Core Activities, Key Deliverable and Tasks, and Communicate. Core Activities represent a linear model for moving through the process; however, it may help to take an iterative approach.

Action: Core Activities					
What steps need to be taken to implement your action?					
Prepare	Activity What is the activity?	Owner Who is responsible for the task?	Start date	End date	Notes
Ideate action plan (Description, vision, timeline, goal, resources needed, etc.)	Complete Implementation Tool				See: Plan: Details
Solidify core implementation team					See: Plan: Project Team
Identify implementation support and partnerships					See: Plan: Implementation Support
Identify key organizational functions					See: Assess: Resources
Identify preliminary key tasks/deliverables					See: Vision: Key Tasks and Deliverables

Action: Core Activities

What steps need to be taken to implement your action?

Refine actions	Activity	Owner	Start	End	Notes
Engage with key internal and external stakeholders to deepen understanding and identify gaps					See: Assess: Engagement
Refine action plan (purpose, goal, timelines, key deliverables etc.) Reconsider the key tasks deliverables through the lens of Assess: Understanding, Assess: Resources, and Assess: Readiness					See: Assess: Understanding Assess: Resources Assess: Readiness
Prioritize key tasks and deliverables and assign to core implementation key members Initiate delivery of key tasks					See: Action: Key Tasks and Deliverables

Action: Core Activities

What steps need to be taken to implement your action?

Implement	Activity	Owner	Start	End	Notes
					See: Action: Key Tasks and Deliverables
Measure and review	Activity	Owner	Start	End	Notes
					See: Review: Performance Measures

Action: Core Activities

What steps need to be taken to implement your action?

Communication	Activity	Owner	Start	End	Notes
Identify a communication plan to disseminate information about the action. *This should be completed prior to implementing any core activities or key tasks					See: Action: Communicate
Implement the communication plan to disseminate information about the action					See: Action: Communicate

Action: Key Tasks and Deliverables

Now that you have more information about the proposed action, revise your previously stated tasks and prioritize them in order of implementation. Assign tasks and note supporting people or teams.

Task What is the task?	Owner Who is responsible for the task?	Support Who or what is supporting the implementation of the task?	Start date	End date	Notes

Action: Communicate

Define a communication plan for sharing information about the action

Stakeholders What stakeholders should communications be tailored to?	Method What method will be used for communication?	Strategy Have you engaged with the communications team?	Timeline What is the timeline for engagement?
Black Community Data Governance Table			
Black social service organizations			
Other			

Review

Review is the last section of the Implementation Tool and focuses on using metrics and measurement to demonstrate the effectiveness of the action. Measures and metrics can then be used to improve the components of the action or to demonstrate feasibility. This section should be iterative and used to ensure the overall sustainability of the action. There are many different types of measures and defining them can be complex. This step serves as a starting place. It may be helpful to work with a person on entity skilled in evaluation to ensure all measures align.

Review: Performance measures			
How will you quantitatively or qualitatively monitor and evaluate the impact of your action? Below is a description of types of metrics ⁸			
Measures	Qualitative measures Non-numerical data that can provide deeper understanding	Quantitative measures Numerical values that can be used to quantify data for analysis.	Notes
<p>Process Measures Centres on the activities and processes related to the planning or delivery of an action or process.</p> <p>Focuses on how goals were achieved and important lessons learned.</p> <p>Sample questions:</p> <ul style="list-style-type: none"> • How is the action being implemented? • Are intended users being reached? • Have the appropriate processes for implementation been followed? 	<p>Perceptions of implementation from core team members</p> <p>Review of communications across implementing partners</p> <p>Process improvement suggestions</p>	<p># of engagements conducted</p> <p># of communities reached</p> <p># of key outputs</p> <p>On-time delivery of action</p>	

Review: Performance measures

How will you quantitatively or qualitatively monitor and evaluate the impact of your action?

Below is a description of types of metrics⁸

Measures	Qualitative measures Non-numerical data that can provide deeper understanding	Quantitative measures Numerical values that can be used to quantify data for analysis.	Notes
<p>Outcome Measures Outcome measures evaluate whether the action met the intended results it aimed to achieve. It focuses on understanding the results of the implemented action.</p> <p>Sample questions:</p> <ul style="list-style-type: none"> • How well did the action improve [target aim]? • What was the influence of the action? • Did the action lead to improvements in the medium and short term? 	<p>Community perceptions of action success</p> <p>Review of impact of action on area of focus</p> <p>Alignment of action with key organizational priorities</p>	<p># of community partners using action</p> <p># of positive media inquiries regarding action</p> <p>Analytical data on use of action</p>	

Review: Performance measures

How will you quantitatively or qualitatively monitor and evaluate the impact of your action?

Below is a description of types of metrics⁸

Measures	Qualitative measures Non-numerical data that can provide deeper understanding	Quantitative measures Numerical values that can be used to quantify data for analysis.	Notes
<p>Economic Measures Assesses the economic impact of the action, particularly if the action has led to cost savings and improved efficiency.</p> <p>Sample questions:</p> <ul style="list-style-type: none"> • Does the action provide economic value? • Is the action a good use of economic resources? 		<p>Cost savings</p> <p>Return on investment</p> <p>Social return on investment</p>	



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