

## AERO-AOCE Spring Special Interest Group (SIG) May 10, 2019 Summary of Keynote and Breakout Sessions

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### Keynote

The day began with Keynote speaker, Dr. David Weinkauf, Senior Policy and Technology Advisor, Information and Privacy Commissioner (IPC) of Ontario. Dr. Weinkauf's presentation focused on privacy in relation to the collection of identity-based data. The presentation and associated PDF documents can be found on the [AERO-AOCE SIG 2019](#) website.

Some key messages:

- The presentation outlined privacy issues to consider and best practices to adhere to
- Collection of identity-based data in Ontario is fairly new
  - But not new for school boards who have been pushing for identity-based data collection for a long time.
  - Two important documents have helped formed current thought and practices:
    - [Privacy Complaint Report MC06-63](#) (Toronto District School Board in 2008) and
    - [MI10-5](#) (Ottawa Carleton District School Board in 2011)
- See also the following documents to further explain the pertinent policies in Ontario:
  - [Anti-Racism Act \(ARA\)](#) passed in 2017
  - [Regulation \(O. Reg 267/18\) under the ARA, 2017](#)
  - [Anti-Racism Data Standards](#) (ARDS)
- Under the ARA, the purpose of collecting identity-based data is to identify and remove systemic racism barriers and advance racial equity in public sector organizations named in regulation.
  - All school boards have been *authorized* to collect identity-based data as of May 1, 2018. This means that if they are collecting race, Indigenous identity, ethnicity and/or religion after this date, they must follow the ARDS rules.
  - By January 2023, school boards are *required* to collect race and identity-based data and comply with the ARDS rules.

- The Anti-Racism Directorate was established on February 16, 2016, to support the government in eliminating systemic racism in government policies, decisions, programs and services.
- By following the Anti-Racism Act and the associated Data Standards, one is following the IPC rules and best practices for the collection of identity based data.
- Considerations of consent:
  - Express versus implied consent: The ARDS requires express consent from individuals providing personal information (i.e., students filling out the survey themselves, or guardians, such as in the case of parents completing surveys on behalf of the student).
  - Tensions exist between consent and Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).
  - At what age does a student provide consent? According to MFIPPA, 16 years old; according to Education Act, 18 years old.
  - If information is not part of the Ontario Student Record or not going in the Ontario Student Record (OSR), then MFIPPA over-rides the Education Act – but this is still a grey area.
  - To avoid any issues, it is important to be transparent and accountable.
  - See: [Guidelines for obtaining meaningful consent](#)
- Storage and security – ideally, best to have 3 databases:
  1. Administrative student data (seen only by the administrator)
  2. Survey data with the student number
  3. Linked data with no names or identifiers for data analysis
- Using these three databases presents certain issues for smaller boards (i.e., the consideration of resources). In smaller boards, multiple databases may not be possible as smaller research departments mean that databases would be managed by the same person. If this is the case, then we need to be conscious of the different hat(s) we wear in each situation; there should be a process in place to ensure there is separation between databases.
- De-identification – Note that privacy laws apply only to “identifiable” information.
- Before reporting and/or releasing information, we need to ask:

- Is the information identifiable? Consider the pieces of information that are adjacent and linked to other pieces (e.g., gender, date of birth, postal codes, etc.) - some information could potentially identify a person.
- Is the person identifiable? When releasing data, need to protect privacy. If no individuals can be identified, then there is no potential privacy harm (see IPC document: [De-identification Guidelines for Structured Data, June 2016](#)).

## **Breakout Sessions**

The rest of the SIG day allowed participants to move through four different breakout sessions on topics related to identity-based data collection from staff and students:

1. Implementation
2. Questionnaire design
3. Coding and Categorization
4. Analysis and Reporting

The breakout sessions were designed to allow participants to share ideas, methods and/or approaches around the collection of identity based data within their boards.

In each breakout session, participants were invited to answer three questions:

1. What challenges are you facing?
2. What have you tried that has worked?
3. What supports, professional learning or resources do you need to accomplish the collection of identity-based data.

Facilitators from the Managing Information for Student Achievement (MISA) - Toronto Region Professional Network Centre (PNC), Data User Group (DUG), AERO-AOCE Executive members, and various researchers from school boards facilitated the sessions and shared their experiences of gathering identity-based data. A summary of key messages from each breakout session is presented below.

### ***Session 1: Implementation***

- *Communication* is key and highly recommended before implementation. A complete communication plan and strategy should be developed and outline:
  - The role of leadership in helping to ensure a good response rate: Support from school board and school administrators (Superintendents and Principals) to ensure teacher/staff buy-in.

- Considerations regarding communication:
  - For Workforce survey
    - Often all staff email is ignored
    - Consider posters in schools – can be seen everywhere
    - Consult with unions and associations on how to reach members and advise on what can be done to encourage members to respond
    - Use social media, website, and newsletters
  - For Parent survey
    - Information session for parents, families, and communities
    - Toronto District School Board (TDSB) has a 66% return rate for parent survey (responses for students in lower grades). TDSB's strategy included using paper surveys sent home with students in a formal TDSB envelope, which is then perceived to be official, like a report card and shows parent voice is valued.
- Consider the pros and cons of implementing a paper and an online survey. For example, a paper survey means a wider net of participants, while for an online survey, data entry is bypassed and data can be more readily captured; to address the attention span of participants and possibly the length of the survey, a progress bar should be used so that respondents can see how far they are with the survey
- *Buy-in* from all stakeholders is essential and highly linked to return rates – more buy-in leads to higher return rates.
- Build *trust* with staff, parents, and all participants:
  - Transparency is important (purpose of collecting information, why it is important)
  - Be transparent and open to questions – avoid being defensive, and educate on the importance and benefits of collecting this data.
  - Run consultations with stakeholders for the Workforce census survey.
- Consider the length of the survey – if it is too long, it will not be fully completed. Also consider attention span and perhaps consider one sheet front and back.
- Consider different *methods* – TDSB uses matrix sampling – half the students get Survey A, other half Survey B – makes for a rich data set but not a long survey to complete.
- Allocate *time* to complete the surveys – determine the best time of the school year (i.e., not coinciding with other surveys); consider collecting information at registration.

- Consider active versus passive *consent*. In what circumstances would active consent apply? Would this be in relation to census data collection only? How is this dependent on the type of survey, staff versus student?
  - See also: [Guidelines for obtaining meaningful consent](#)
- Note that participation is optional, done during school time and under supervision of a teacher.
- Some boards use incentives (money to schools for high completion rates).
- Privacy officer is involved from the beginning.
- Use the Home Room to complete, like a test or exam that takes 20 – 30 minutes to complete.
- Consider *piloting* – allows for improvement of tool; building trust by showing what was done as a result of the collection; informs the research process.
- Consider data storage on own server; SurveyMonkey – data are seen outside the system

## **Session 2: Questionnaire Design**

- Identify a *framework* or theoretical orientation to guide this research. For example, Anti-Oppression, Anti-Racism and/or Critical Race theory.
- Consider limiting the number of *open-ended questions*: coding open-ended questions can be difficult (e.g., ethnicity) – make categorization for open-ended questions.
- Consider the *purpose* of each question:
  - Only include questions in the survey that you plan to address-do not collect data for the sake of collecting data.
  - Ask: how will the information help with the policy or programming decisions?
- Check the *language* of the question - do not include questions that could stigmatize or further marginalize communities.
- Consider including and using certain questions to verify the data.
- Ensure questions are *voluntary*. Participants should be able to skip questions. Communicate the purpose and voluntary nature of the census.
- *Collaboration* among boards: share information, resources, strategies, and surveys from boards that have already administered the census (e.g., York Region District School Board, Toronto District School Board).
- Do not underestimate the amount of time and resources required for a census.
- It would be helpful to have one standard census survey (or template) that could be used by all boards.

- Refer to Anti-Racism Data Standards on how to ask ethnicity, religion, Indigenous identity and race questions.
- *Consultation* is key for trust and relationship building and to ensure the survey items, analysis and reports meet the needs of all stakeholders – e.g. consultation with the community, union/federations, parents, families, and students.
- Reciprocity leads to trust and buy-in. Be prepared to share results with participants/ community/public.
- *Communication*, relationship building and engagement (staff, students and communities) are essential to the survey's success. Differentiate between communication and community engagement:
  - Communication is about pushing information
  - Community engagement is engaging the community to work together in developing the survey

### ***Session 3: Coding and Categorization***

#### *Scope and Challenges*

- *Ethnicity* is a complex question and the conversation around processes to code the question is still ongoing.
- The way the ethnicity/cultural background question is asked is different across boards that have started collecting identity based data.
- There is debate amongst boards on how *demographic* questions are worded.
- Data cleaning is complex.
- There is a *capacity* issue within boards – coding and data cleaning take time, so the lack of time and resources may dictate the approach (larger vs. smaller boards).

#### *Issues to investigate*

- *Purpose*: What are we supposed to be asking with an ethnicity/cultural background question?
- *Assigning codes/interpretation*: Who should be involved in building categories and assigning codes? What does this process look like? (Note: Importance of involving the community when assigning or building categories – especially with Indigenous communities.)
- *Standardization and roles*: Do we need a standard way of asking questions for across board comparison, or is that the role of the Ministry of Education?

- *Use of information:* How are we using that information? How do we report it? How do schools/boards unpack it? (Note: Some boards are asking it differently (open vs closed or both); some boards report on it, others use it to code/clarify support other question items.

#### Next steps – suggestions

- It would be helpful to share the process or case-study approaches/examples from boards on how they proceed with *data cleaning* and *coding* the demographic data.
- Consider sharing a summary of ethnicity codes.
- Consider approaching the Ministry for standardized tools and templates

#### **Session 4: Analysis and Reporting**

- We must consider how to report back to schools - what is useful to them without compromising the privacy or suppressing data that can affect data quality?
- Publically release *aggregate* data only: report board level only; perhaps regional level (dependent on size), not school level.
- Do not report when sample size is less than 15.
- It is important to provide information back to schools so staff can see the value of collecting information and its use.
- Consider choosing *one theme a month* to report back on: focus for the month.
- Ensure there is an *understanding of the purpose* of reporting back (other than data standards).
- Consult Anti-Racism Act and *data standards* – which measures are required for analyses and reporting?
- Some open-ended responses can show prejudices and/or phobias (e.g. “Attack Helicopter” is transphobic, homophobic and requires education in schools).
- Consider several *types* of reports: a stakeholders report, a management report, a technical report.
- However, the access and use of these reports should be made clear and determined upfront; documentation is accountability.
- *Consult with stakeholders* on what to report: The data belongs to the community; consider the *diverse needs* of the community.
- Have discussions with an Equity Team and leadership to determine groupings to report.
- Work with communication departments to create *info-graphics* (data visualization).

- Use simple language to report key findings so stakeholders and public can understand the results.
- When reporting avoid intent or language that shows deficit; use language of strength/growth.
- Consider professional development requirements around *data literacy* for stakeholders and staff.
- More *support* needed *from the Ministry* in terms of clarifying what to report and how; how to use the identity-based data collected.

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