Western University
Office of the Associate Vice-President (EDI)
Draft EDI-D Demographic Data Governance Policy
October, 2021

Introduction:

An essential requirement for Western to fulfill its commitments to equity, diversity, inclusion and decolonization (EDI-D) involves the responsible collection and analysis of personal information and data that accurately reflect the demographic make-up of our campus community.

This policy aims to ensure that Western's approach to EDI-D demographic data collection and use is culturally safe, ethical, purposeful, useful, transparent, and accountable to the campus community.

It also aims to help Western monitor and respond to EDI-D trends and issues, and to help the University report publicly on its progress towards EDI-D goals.

And it aims to protect the privacy and rights of the individuals from whom data is collected in accordance with the principles of Indigenous data sovereignty, Ontario Data Standards for the Identification and Monitoring of Systemic Racism, University policy and agreements, and provincial and federal legislation.

Guiding Principles:

Underlying this policy are commitments to:
- increasing the representation of equity-deserving groups at Western;

- creating an equal sense of belonging, safety, and opportunity to participate and contribute for all community members;

- protecting the confidentiality of individuals' personal information;

- the axiom "nothing about us, without us," which recognizes that the active engagement of equity-deserving groups is critical in the development and implementation of EDI-D initiatives, including EDI-D data governance policy, collection, and analysis;

- consulting with and drawing on the expertise of appropriate EDI-D offices and groups (e.g., Office of Indigenous Initiatives, Office of the AVP (EDI), Human Rights Services, EDI Advisory Council, Faculty Relations) to inform culturally appropriate data collection and analysis strategies;

- creating data collection and analysis strategies with specific equity-deserving groups in mind, and avoiding the grouping of equity-deserving groups together (e.g., avoid the use of BIPOC), being mindful of the unique needs and identity of distinct groups;

- an intersectional approach to data collection and analysis, recognizing that a person's identity has multiple dimensions;

- data ownership, by respecting that decisions about sharing personal information are a matter of the owner's personal choice;

- integrity and transparency, by seeking permission from individuals (i.e., asking for their consent) to collect only that personal demographic information which is helpful to advancing our community's EDI-D goals;

- only using demographic information in the ways described at the time the data is collected; any proposed change in use of personal information will require clear and complete communication with owners and the individual owner's consent to such use.

Stakeholder groups:

This policy applies to everyone who works, studies, and/or lives at Western, as well as external community members who contribute to the University's mission. This includes groups such as:

- *Employees & applicants*
- *Students, trainees & applicants*
- *Alumni*
- *Volunteers*
- *Community partners*

Consent:

Individual community members (data owners) will be asked for their consent to provide personal demographic information. Consent means owners choose to share their data:

- freely, knowing they have the right to refuse;
- on the basis of clear, complete information describing how the data will be used;
- prior to the requested personal information being collected by the University;
- in a manner accessible to the owner (i.e., not necessarily in writing)
- knowing consent can be withdrawn if the owner's personal decisions change (Except where the results of aggregate data analysis have already been made public)

Data Collection:

Western will collect personal information using methods that are accessible and culturally appropriate for the question(s) under study. This may include, but is not limited to, surveys (e.g., paper or online), private interviews, sharing circles, or group meetings.

Data Use:

Data collected under this policy will be analyzed and used exclusively for the purpose of advancing Western's EDI-D goals. This excludes purposes related to academic research, but may entail support for more specific administrative initiatives related to:
- workforce analysis & reporting;
- employee recruitment, promotion, tenure & retention;
- student recruitment, performance evaluation, retention & graduation;
- educational programming & curriculum development;
- quality assurance & improvement (i.e., initiatives to establish, evaluate, or enhance standards for administrative processes and university services);
- institutional planning & budgeting.

Safeguards:

Respecting each individual's right to privacy and protecting the security of personal demographic information collected under this policy are of paramount importance.

Access to identifiable data will be limited strictly to authorized University staff responsible for EDI-D policy and initiatives. Appropriate IT security measures (technical and procedural) will be taken to control and protect access to the information.

Only aggregated data (grouped data) will be used for numerical reporting. Where appropriate, small data sets will either be suppressed or consolidated into larger samples or data sets to ensure confidentiality.

Safeguard systems and security protocols for EDI-D data will be audited regularly by an external party independent from the university.

Glossary:

The following definitions inform the use of specific terms in this policy.

- **Accessible:** refers to something that can be easily reached or obtained, without obstacle; a facility that can be easily entered; information that is easy to access. [1]

- **Confidentiality:** the duty to ensure personal information is kept private to the extent possible.

- **Data Ownership:** refers to the possession of and responsibility to keep information.

- **Decolonization:** recognizes the need for structural and systemic change that unpacks the privileged knowledges of Eurocentrism, and unsettles and transforms the legacies of systemic injustices experienced by many subjugated peoples.[2]

- **Diversity:** the presence of a wide range of human qualities and attributes within an individual, group or organization. Diversity includes such factors as age, sex, race, ethnicity, physical and intellectual ability, religion, sexual orientation, educational background and expertise. [1]

- **Equity:** fairness, impartiality, even-handedness. A distinct process of recognizing differences within groups of individuals, and using this understanding to achieve substantive equality in all aspects of a person's life.[1]

- **Inclusion:** appreciating and using our unique differences – strengths, talents, weaknesses and frailties – in a way that shows respect for the individual and ultimately creates a dynamic multi-dimensional organization. [2]

- **Intersectionality:** refers to the complex, cumulative way in which the effects of multiple forms of discrimination combine, overlap, or intersect, resulting from the intersection of various identities, especially in the experiences of marginalized individuals or groups.[3]

- **Personal Information:** recorded information that may identify a specific individual, such as name, address, ID #, age, race, ethnicity, sex, gender, employment status, etc.

- **Privacy:** the right of an individual to have control over how their personal information is collected, used, and/or disclosed.

- **Right of Refusal:** an individual's right to not disclose personal information.

- **Trainees:** refers to Postdoctoral Fellows and Scholars.

- **Transparency:** allows people affected by administrative decisions to know about results and the process that led to decisions.

Sources:

[1] [Ontario Human Rights Commission, Glossary of human rights terms](#)

[2] Smith, G.H., & Smith, L.T. (2019) Doing Indigenous work: Decolonizing and transforming the academy. In E.A. McKinley & L.T. Smith (Eds.), Handbook of Indigenous education (pp.11). Singapore: Springer

[3] Canadian Standards Association (2020) Mental health and well-being for post-secondary students (pp.18).