

Dec. 2, 2020

Anne Coghlan, Executive Director and Chief Executive Officer  
College of Nurses of Ontario  
101 Davenport Road  
Toronto, ON M5R 3P1

**Re: Race-based and Indigenous identity data – advancing racial equity in nursing**

Dear Anne,

Racism is a determinant of health that plays a key role in generating and reinforcing health and social inequities among Canadians. Racism is also entrenched in the history of nursing in our country and continues to have a devastating impact on the lived experiences of racialized nurses. It is well past time for better information about the representation of racialized groups in nursing so that we can appropriately address and ultimately expunge racism from our profession.

This is also a public health crisis that cannot be ignored and threatens the health and wellbeing of racialized nurses and their ability to provide safe, compassionate and ethical care to Ontarians. As such, the Registered Nurses' Association of Ontario (RNAO) is calling on the College of Nurses of Ontario (CNO) – the regulatory body for nursing practice in Ontario – to collect and report race-based and Indigenous identity disaggregated data and initiate community consultations on this process immediately. Decisive action from national and provincial nursing organizations and institutions is urgently needed to enable real and meaningful change to overcome the systemic racism and discrimination that exists in our profession.

As is widely known, RNAO launched a *Black Nurses Task Force* in June 2020. The task force is comprised of 17 registered nurses (RN), nurse practitioners (NP) and nursing student members of the association who identify as Black and are from diverse nursing career roles, stages, health sectors, geographic locations and organizations/institutions.<sup>1</sup> Through this task force of Black nurses and the strong voices of RNAO members of all races, a clear recommendation has come forth: urge the CNO to collect race-based data as an important step in dismantling systemic racism within the nursing profession in Ontario. Nurses across this province understand that data is needed to measure the scope of systemic racial inequality and to track progress towards creating a fair, inclusive and equitable profession for all nurses. To achieve CNO's vision of *leading in regulatory excellence*, RNAO asks that this process be undertaken without delay to pave the path forward to close the gaps, eliminate barriers, and advance a stronger nursing profession that can fully serve and protect Ontarians.

COVID-19 has added urgency to the collection of race-based data. The pandemic is an unprecedented crisis that has had a disproportionate impact on racialized and marginalized people – including health-care workers – in Ontario, as confirmed by the findings of novel race-based data. For example:

- Toronto Public Health has found certain racialized groups were over-represented in areas with higher COVID-19 case rates, including people who are Black, South Asian, Southeast Asian, and Latin American. Eighty-three per cent of people with reported COVID-19 infection identified with a racialized group.<sup>2</sup>
- The region of Peel reported that South Asian, Black and Latino race groups were overrepresented among COVID-19 cases compared to their respective share of the Peel population.<sup>3</sup>

Further, health-care workers (HCW) in Ontario – including nurses – have faced exceptional risks during the pandemic.<sup>4</sup> In Canada, women represent the majority of HCWs, many of whom are immigrant or racialized and represent a substantial proportion of COVID-19 HCW cases.<sup>5</sup>

COVID-19 has ignited critical dialogue on why race-based data matters, but data must go beyond this crisis. By 2036, racialized people will account for an estimated 48 per cent of Ontario’s population.<sup>6</sup> The province’s nursing workforce should mirror the composition of the Ontario population and data is a necessary and powerful tool to achieve this standard. At present, of the over 175,000 nurses (NP, RN, RPN) registered and practising in Ontario, there is no information on the proportion of Indigenous, Black, and other racialized groups that make up that total.<sup>7</sup> There is broad recognition that this is a problem that needs to be corrected. Ontario’s *Anti-Racism Act, 2017*<sup>8</sup> mandates the collection of race-based data by certain organizations in the public sector for the purpose of eliminating systemic racism and advancing racial equity. Anti-racism data standards released in 2018<sup>9</sup> provide guidance on how to proceed with data collection, management and use. The Canadian Institute for Health Information asserts that organizations collecting race-based data should not only implement data standards, but also measures to mitigate the risk of harm, such as facilitating informed consent, ensuring privacy, security and confidentiality, and committing to transparency and accountability for its use.<sup>10</sup>

RNAO calls – in the strongest possible terms – on our regulatory body, CNO, to immediately begin to collect race-base data; and to stand in solidarity with RNAO in our commitment to achieve a health system in which all have equal opportunities to participate fully in the nursing profession to their maximum potential. We are here to support CNO in advancing our request immediately.

We look forward to your response to this request.

Warm regards,



Doris Grinspun, RN, MSN, PhD, LLD(hon), Dr(hc), FAAN, O.ONT.  
Chief Executive Officer, RNAO

CC: Sandra Robinson, President, CNO Council  
CNO Council  
Ena Chadha, Chief Commissioner, Ontario Human Rights Commission  
Hon. Christine Elliott, Ontario Minister of Health  
Hon. Greg Rickford, Ontario Minister of Indigenous Affairs  
Sylvia Jones, Ontario Solicitor General  
Helen Angus, Ontario Deputy Minister of Health  
Shawn Batise, Ontario Deputy Minister of Indigenous Affairs  
Deborah Richardson, Deputy Solicitor General, Correctional Services  
Nosa Ero-Brown, Assistant Deputy Minister, Ontario Anti-Racism Directorate  
Dr. Michelle Acorn, Provincial Chief Nursing Officer  
Hon. Patty Hajdu, Minister of Health, Government of Canada  
David O'Toole, President and CEO, Canadian Institute for Health Information

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<sup>1</sup> Grinspun, D. (2020, August 21). *Black lives still, and always will, matter—Black August and an update on RNAO's Anti-Black Nursing Task Force*. Doris' COVID-19 Blog. Retrieved from <https://doris-blog.rnao.ca/post/black-lives-still-and-always-will-matter-black-august-and-update-rnaos-anti-black-nursing-task>

<sup>2</sup> City of Toronto. (2020, July 30). *Toronto Public Health releases new socio-demographic COVID-19 data*. News Release. Retrieved November 25, 2020, from <https://www.toronto.ca/news/toronto-public-health-releases-new-socio-demographic-covid-19-data/>

<sup>3</sup> Region of Peel. (2020, August 7). *COVID-19 and the social determinants of health. Race and occupation*. Retrieved from [https://www.peelregion.ca/coronavirus/\\_media/COVID-19-race-and-occupation.pdf](https://www.peelregion.ca/coronavirus/_media/COVID-19-race-and-occupation.pdf)

<sup>4</sup> Brophy, J. T., Keith, M. M., Hurley, M., & McArthur, J. E. (2020). Sacrificed: Ontario healthcare workers in the time of COVID-19. *NEW SOLUTIONS: A Journal of Environmental and Occupational Health Policy*, 1048291120974358. Retrieved from <https://journals.sagepub.com/doi/pdf/10.1177/1048291120974358>

<sup>5</sup> Ibid.

<sup>6</sup> Government of Ontario. (2017, December 14). *Ontario working to build an inclusive and equitable society for all: Province releases first Anti-Black Racism Strategy*. Anti-Racism Directorate. Retrieved from <https://news.ontario.ca/en/release/47523/ontario-working-to-build-an-inclusive-and-equitable-society-for-all>

<sup>7</sup> College of Nurses of Ontario. (2020, November 11). *Membership totals at a glance*. Retrieved November 25, 2020, from <https://www.cno.org/en/what-is-cno/nursing-demographics/membership-totals-at-a-glance/>

<sup>8</sup> *Anti-Racism Act*, 2017, S.O., 2017, c.15. Retrieved from <https://www.ontario.ca/laws/statute/17a15>

<sup>9</sup> Government of Ontario. (2020, November 19). *Data standards for the identification and monitoring of systemic racism*. Retrieved November 25, 2020, from <https://www.ontario.ca/document/data-standards-identification-and-monitoring-systemic-racism>

<sup>10</sup> Canadian Institute for Health Information. (2020). *Proposed standards for race-based and Indigenous identity data collection and health reporting in Canada*. Retrieved from <https://www.cihi.ca/sites/default/files/document/proposed-standard-for-race-based-data-en.pdf>