

June 5, 2020

The Honourable Navdeep Bains, P.C., M.P.
Minister of Innovation, Science and Industry
House of Commons
Ottawa, Ontario
K1A 0A6

Re: Open letter calling for a national strategy for the collection of disaggregated health data

Dear Minister Bains:

The COVID-19 pandemic has affected the daily lives of all Canadians. We acknowledge the actions being taken by governments across Canada to help Canadians through this unprecedented crisis. Decisions made now and in the coming months will be some of the most important made in generations and will affect Canadians for years to come. It is, therefore, imperative that decision-makers have access to the best information available. Human rights obligations must be recognized and consideration given to the disproportionate impacts of COVID-19 on vulnerable groups such as racialized groups including African Canadians, Indigenous people, people with disabilities, women, older people living alone or in institutions, and low income communities who have unequal access to healthcare, childcare, and are often underemployed.

Traditional health data collection approaches, which are based on a high level of aggregation and are primarily designed to produce national averages, reveal limited information about the severity of the impact of the virus on vulnerable and marginalized Canadians, including African Canadians and other racialized groups and Indigenous people. Various stakeholders and international human rights bodies have noted the absence in Canada of this specific form of reliable, comprehensive and publicly-available disaggregated data.

Canada's federal, provincial and territorial human rights commissions are calling on the Government of Canada to develop and implement a nation-wide strategy for the collection of disaggregated health data focussed on race and Indigeneity. The systematic collection and intersectional analysis of disaggregated health data that includes race and Indigeneity are essential to identifying inequalities and advancing human rights in Canada as we navigate this unprecedented public health crisis.

Indeed, the right to health is closely related to and dependent upon the realization of other human rights, and the collection and publication of disaggregated data will point to key areas where concerted effort is needed to close existing healthcare and other human rights gaps. It is essential that this strategy be nationwide, inclusive, comprehensive and coordinated with civil society, African Canadian and other racialized communities, First Nations, Inuit and the Métis Nation, human rights advocates, and Canada's independent human rights commissions in all jurisdictions.

Data collection exercises should not create nor reinforce existing discrimination, bias or stereotypes against marginalized groups. African Canadian, Indigenous and all racialized groups should play a key role in the release of disaggregated data to ensure it recognizes and mitigates the risk of increased stigmatization and marginalization for racialized communities that have already experienced harm as a result of COVID-19 and historic discrimination in Canada.

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As we work together to flatten the curve of the current pandemic and chart a course to recovery, it is more important than ever that governments are equipped with robust and reliable race-based and Indigenous-identifying data. The collection, analysis and public reporting of disaggregated health data across Canada will bolster the efforts of all levels of government and will ensure that nobody is left behind nor unduly affected by the COVID-19 pandemic, nor any future national public health crises.

Yours sincerely,



Marie-Claude Landry, Chief Commissioner
Canadian Human Rights Commission



Anne Clennet, Director
Communication, Education and Engagement
Alberta Human Rights Commission



Kasari Govender, Commissioner
British Columbia's Office of the Human Rights
Commissioner



John Burchill, Chair
Manitoba Human Rights Commission



Marc-Alain Mallet, Director
New Brunswick Human Rights Commission



Carey Majid, Executive Director
Newfoundland and Labrador Human Rights
Commission



Charles Dent, Chair
Northwest Territories Human Rights Commission



Christine Hanson, Director and CEO
Nova Scotia Human Rights Commission





Raj Dir, Executive Director & Chief Legal Counsel
Ontario Human Rights Commission



Ontario
Human Rights Commission
Commission ontarienne des
droits de la personne



Brenda Picard, Executive Director
Prince Edward Island Human Rights Commission



Lesley McCullough, Acting Director
Yukon Human Rights Commission



c.c.:

The Honourable Patty Hajdu, P.C., M.P.
Minister of Health

The Honourable Bardish Chagger, P.C., M.P.
Minister of Diversity and Inclusion and Youth

Honourable Tyler Shandro, M.L.A.
Minister of Health, Alberta

Honourable Adrian Dix, M.L.A.
Minister of Health, British Columbia

Dr. Bonnie Henry, Provincial Health Officer
British Columbia

Honourable Cameron Friesen, M.L.A.
Minister of Health, Seniors and Active Living, Manitoba

Honourable Hugh J. A. (Ted) Flemming, Q.C., M.L.A.
Minister of Health, New Brunswick

Honourable Dr. John Haggie, M.H.A.
Minister of Health and Community Services, Newfoundland and Labrador

Honourable Diane Thom, M.L.A.
Deputy Premier and Minister of Health and Social Services, Northwest Territories

Honourable Randy Delorey, M.L.A.
Minister of Health and Wellness, Nova Scotia

Honourable Christine Elliot, M.P.P.
Deputy Premier and Minister of Health, Ontario

Honourable Doug Downey, M.P.P.
Attorney General, Ontario

Honourable James Aylward, M.L.A.
Minister of Health and Wellness, Prince Edward Island

Honourable Bloyce Thompson, M.L.A.
Minister of Justice and Public Safety and Attorney General, Prince Edward Island

Honourable Pauline Frost, M.L.A.
Minister of Health and Social Services, Yukon

Honourable Tracy-Anne McPhee, M.L.A.
Minister of Justice, Yukon