

Collection of Race Based Data Identifiers

COTM will start collecting this data with the 2025/2026 renewal March 3, 2025, and for all new registration applications as of June 1, 2025.

Why is COTM collecting this information?

A key strategy to achieving racial health equity is the collection of reliable, race-based data to monitor inequalities and support the identification of inequities. COTM works with the Canadian Institute of Health Information (CIHI) whose Health Systems aim to provide high-quality health care to all people regardless of their sex, gender, income, race or other socio-demographic characteristics. Disaggregating routine health care indicators can reveal inequalities across population groups. Monitoring health inequalities builds our understanding of the impact of policies, programs and practices. Data standards encourage harmonized collection and ensure high-quality and comparable data across regions, organizations and systems. As part of the COTM's responsibility in working with CIHI, COTM chooses to include the voluntary collection of race-based and Indigenous identity data towards achieving healthcare system equity. COTM, in compliance with *The Occupational Therapists Act*, has an accountability to collect certain personal information in the interests of the public. Race-based and Indigenous identity are not data that are required to be collected and therefore are collected voluntarily and not included in the Public OT Register.

What are Race Based Data Identifiers?

These are values based on self-identified ethnicity, racialized groups and indigenous identities. The identifiers will appear as follows in the COTM registration database:

Indigenous Identity Data Value

First Nations
Inuk/Inuit
Métis

Definition

A person who self-identifies as First Nations
A person who self-identifies as Inuk/Inuit
A person who self-identifies as Métis

Racialized Group Data Value

Black
East Asian
Indigenous
Latin American
Middle Eastern

South Asian

Definition

African, African Canadian or Afro-Caribbean descent
Chinese, Japanese, Korean, or Taiwanese descent
First Nation, Inuk/Inuit or Métis descent
Hispanic or Latin American descent
Arab, Persian or West Asian descent (e.g., Afghan, Egyptian, Iranian, Kurdish, Lebanese, Turkish)
South Asian descent (e.g., Bangladeshi, Indian, Indo-Caribbean, Pakistani, Sri Lankan)

Southeast Asian

Cambodian, Filipino, Indonesian, Thai, Vietnamese or other
Southeast Asian descent

Another Race Value

Includes values not described above.

Can I choose not to provide the information?

Yes, all members have the option to not answer, or they may select an item from the list of choices which includes the choice “Prefer to not answer”.

Collection of these data is voluntary, and there will be no repercussions for individual members’ decisions about providing or not providing these data.

Members’ race-based and Indigenous identity data will not be used:

- a. In any way that could identify an individual member
- b. With the intention to impact, harm or discriminate against a member
- c. To deny registration or be checked against a member’s safe practice registration requirement.
- d. By COTM in complaints or discipline processes; or
- e. To perpetuate stereotypes of specific groups.

What is Healthcare System Equity?

COTM recognizes that there exists inequity in the healthcare system. We collect data that COTM’s members voluntarily provide, which enables us to support and guide other institutions toward practices that reduce the disparity we acknowledge exists in our health care system. Our goal is that this practice will improve healthcare equity and influence systemic improvements in healthcare that will benefit all Canadians, and particularly those Canadians that experience healthcare inequities.

Will this data be shared outside COTM?

COTM uses the Canadian Institute for Health Information (CIHI) Health Human Resources Minimum Data Set (“HHR MDS”) data standard as a guide to collect these data.

COTM reports or discloses health workforce data, including race- based and Indigenous identity data, annually to CIHI using a secure portal on the CIHI website. Member name data is not provided with the records. A unique, non-public identifier is issued to further protect member data from being identified is used, called a CIHI identifier. A Data Sharing Agreement (DSA) is maintained between CIHI and COTM. This legal document holds CIHI accountable for protecting and only storing, transmitting, disclosing and using the health workforce data in accordance with the agreement.

Race-based and Indigenous identity data are shared with the Provincial Government only upon request by the Government and in deidentified and aggregate form, unless otherwise required by legislation.

How will my data be collected, stored and protected?

Data Collection, Storage and Protection

- a. All race-based and Indigenous identity data are collected, handled, stored and disposed of in a secure and confidential manner by COTM.
- b. COTM collects race-based and Indigenous identity data in ways that are safe, respectful, responsible and intends no harm.
- c. COTM demonstrates transparency and accountability by providing clear information on how these data are gathered, stored, used and managed.
- d. COTM provides an adequate explanation to members of the benefits and risks of collecting these data.
- e. Individual member's race-based and Indigenous identity data are collected and stored in a secure regulatory member management software system that complies with the highest standards of cybersecurity.
- f. Access controls are used in the security system to limit staff access to view and edit these specific data. Staff access is determined by the Executive Director and is to be limited to only those staff with a legitimate, role-based need for access.

For more information, please contact COTM at (204) 957-1214 or by email at OTinfo@cotm.ca