

Equity, Diversity and Inclusion (EDI) Toolkit Resource: Guide to Monitoring and Reporting EDI Performance





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Guide for Mining Companies: EDI Monitoring, Performance and Reporting

TSM Equitable, Diverse and Inclusive Workplaces Protocol¹ Relevance:



(Facility Criteria)



(Facility Criteria)

This guide helps organizations understand how to meet the requirements described in the TSM Equitable, Diverse and Inclusive Workplaces Protocol. Note that the advice in this guide is generally based on achieving Level A criteria of Indicator 1 of the Protocol. Advice on achieving other criteria levels (B, AA and AAA) is noted throughout where applicable.

Using this Guide

This guide will help mining facilities confirm that they are engaged in developing an effective approach to information gathering and reporting on equitable, diverse and inclusive workplaces. A corporate commitment to EDI that aligns with the organization or facility's business strategy and objectives will direct the information to be collected, analyzed and monitored. Corresponding EDI action plans/strategies detail how the EDI commitment will be fulfilled, including objective setting, resourcing and identifying roles and responsibilities. At the facility or site level, monitoring and reporting information related to an equitable, diverse and inclusive workplace helps to show progress toward meeting the corporate EDI commitment.

¹ See: [Towards Sustainable Mining: Equitable, Diverse and Inclusive Workplaces Protocol](#)



Why Monitor and Report on EDI Efforts?

The purposes of monitoring and reporting information related to equitable, diverse and inclusive workplaces will provide evidence of:

1. The meaningful advancement of EDI within the organization.
2. The nature and extent to which EDI efforts are integrated within organizational operations.
3. The effectiveness and impacts of EDI action plans, in relation to a corporate EDI commitment.
4. Whether a corporate EDI strategy is accomplishing its objectives as well as point to next steps in the strategy's evolution.



TSM EDI Protocol, Indicator 3: MONITORING, PERFORMANCE AND REPORTING (Facility Criteria)

LEVEL B CRITERIA

LEVEL B CRITERIA 1

DEMOGRAPHIC DATA

Collecting data on demographic diversity (except in jurisdictions that prohibit collection of relevant data) on a regular basis is an important aspect tracking workplace diversity and program effectiveness. Data typically collected for workplace diversity reasons may relate to gender identity, age, race/ethnicity, Indigeneity, newcomer/immigrating experience or experience of a disability, for example. Questions related to identity are standardly optional when included in data-gathering efforts as part of recruitment employee satisfaction surveys, exit interviews or other data-gathering or feedback efforts. The results identify the degree of diversity at the time of data collection and can be used to inform or refine EDI action plans. While the collection of demographic information should be collected on a voluntary, confidential and anonymous basis, participation can be encouraged as part of a positive workplace culture.

LEVEL B**CRITERIA 2****PRELIMINARY SCOPE**

Facilities can draft a preliminary scope in preparation for data collection and reporting as an equitable, diverse and inclusive workplace. The scope for data collection can range from introductory (e.g., workplace diversity) to complex (e.g., workplace EDI competencies). Defining data collection methods (e.g., staff surveys, HR records of training completed, exit interviews, focus groups, etc.) and a schedule of data collection and reporting are important to enabling benchmarking and the tracking of trends over time. Given how many of these data pieces rest with Human Resources (HR), it may make sense for HR to be the facility lead for EDI data. However, there are many options for this lead role, including a representative of Occupational Health and Safety, Innovation, ESG, etc.

LEVEL B**CRITERIA 3****ACTION PLAN**

An action plan/strategy to meet the criteria of the TSM EDI Protocol, Indicator 3, Level A Criteria will provide direction to information gathering and reporting efforts. Using the EDI commitment and objectives as guides, an action plan/strategy will recognize current efforts for data collection and reporting as an equitable, diverse and inclusive workplace. Compare the current efforts with those described in the Level A Criteria to identify any gaps. The results will inform the detailed actions (i.e., who/what/when/how) needed to meet that level and to move forward.



TSM EDI Protocol, Indicator 3: MONITORING, PERFORMANCE AND REPORTING (Facility Criteria)

LEVEL A CRITERIA

LEVEL A CRITERIA 1

ENGAGEMENT

Committing to information gathering and reporting efforts that align with the TSM Framework on Equitable, Diverse and Inclusive Workplaces² requires decisions be made around the types of information collected, how the information will be collected, stored and how it will be reported and to whom. The development of facility-level scope and methods for data collection and reporting will benefit from engaging multiple voices in the process. This includes seeking input, feedback, or advice from internal and/or external communities of interest³, including relevant union/employee representatives and managers from various internal departments, functions, or lines of business and from a cross-section of individuals who bring diverse perspectives and experiences.

² See [TSM Framework on Equitable, Diverse and Inclusive Workplaces](#) for more detail.

³ See the brochure on Engaging Communities of Interest available at <https://mihr.ca/inclusion-diversity/mining-edi-supports> for more detailed advice.

LEVEL A CRITERIA 2

REPORTING OF DEMOGRAPHIC DIVERSITY

Further to data collection on demographic diversity on a regular basis (except in jurisdictions that prohibit collection of relevant data), mining facilities publicly report on the findings to demonstrate transparency. Tracking the demographic diversity of the workforce over time is an important method of tracking facility success in creating a diverse workplace. Reporting the results publicly shows commitment to EDI and an openness and willingness to engage in EDI discussions. Ongoing monitoring and analysis of demographic diversity helps to reveal patterns or trends and is part of integrating EDI into workplace operations.

LEVEL A CRITERIA 3

DATA COLLECTION COMPLIANCE

When information or feedback is requested from workers, it is critically important to ensure that the methods of data collection comply with any relevant privacy laws. At the federal level, the Personal Information Protection and Electronic Documents Act (S.C. 2000, c. 5) or PIPEDA⁴, governs how private sector organizations collect, use and disclose personal information in the course of commercial business. ‘Personal information’ refers to information about an ‘identifiable individual’ and can include race, national or ethnic origin, religion, age, etc.⁵ Consider why and how personal information will be collected, how worker anonymity will be safeguarded and how data will be stored.⁶

LEVEL A CRITERIA 3A

PURPOSE OF DATA COLLECTION

To create transparency and trust, be clear with workers about what kind of personal information will be collected as well as the purpose for collecting personal information or feedback. Types of information that may be gathered by mining companies include demographic data, video surveillance images, worker feedback as part of a workplace survey, etc. Share how the information will be used by the organization (e.g., identity verification, security files, etc.). If personal information will be shared with any third-party organizations, let workers know and explain who the parties are and how they will be involved.⁷ If third-parties are used, the company is still accountable for the parties’ use and storage of personal worker information.

4 See <https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/> for more information on PIPEDA.

5 Office of the Privacy Commissioner of Canada, *Summary*.

6 See the brochure on *Gathering and Managing Sensitive Information* available at <https://mihr.ca/inclusion-diversity/mining-edi-supports>.

7 Office of the Privacy Commissioner of Canada, *Ten Tips*.

CONFIDENTIALITY

Individuals generally control the decision to share their personal information. The ability to collect personal information is based on having obtained the individual's consent. That consent is only valid "if it is reasonable to expect that an individual to whom the organization's activities are directed would understand the nature, purpose and consequences of the collection, use or disclosure of the personal information to which they are consenting."⁸ Clarity of purpose and the intended use of the personal information, then, is key to obtaining consent.

Consent from workers to collect and use their personal information or feedback may be obtained through various methods, such as⁹:

- An application form may be used to seek consent, collect information, and inform the individual of the use that will be made of the information. By completing and signing the form, the individual is giving consent to the collection and the specified uses.
- A checkoff box may be used to allow individuals to request that their names and addresses not be given to other organizations. Individuals who do not check the box are assumed to consent to the transfer of this information to third parties.
- Consent may be given orally when information is collected over the telephone.
- Consent may be given at the time that individuals use a product or service.

Clearly communicating the type of personal data or input to be collected and how the data will be used helps individuals make the choice to share their information and/or feedback. Voluntary consent can also be encouraged by sharing how the personal data will be kept confidential. This will include providing details of who or what roles will have access to the data and under what circumstances, including any third-parties.

8 Office of the Privacy Commissioner of Canada, *Frequently Asked Questions*.

9 Office of the Privacy Commissioner of Canada, *Interpretation Bulletin: Form of Consent*.

LEVEL A**CRITERIA 3C****PROTECTING ANONYMITY**

Companies that seek workers' information or feedback can encourage voluntary participation by sharing how demographic or other identifiable information will be kept separate from worker feedback. Keeping these types of information separate helps to preserve worker anonymity. Using a third-party organization for data collection and analysis is one way of ensuring these data pieces are kept separate. With this option, the third-party shares these data pieces with the mining company in a way that prevents them from being re-combined. Data analysis results can then only be reported or communicated in aggregate and cannot be associated with any specific individuals. If data is collected and analyzed internally by the mining company, the same principle applies in terms of keeping identifiable information separate from worker feedback. Details of who or what roles have access to the different data pieces will influence worker trust in the process and in obtaining their consent.

LEVEL A**CRITERIA 3D****DATA STORAGE AND USE**

Planning for and communicating how personal information will be safely and ethically stored is important to build worker trust and likelihood of providing consent.¹⁰ PIPEDA sets out statutory provisions for the safeguarding of personal information, stating that organizations that collect such data will¹¹:

- Protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.
- Protect personal data through physical (e.g., locking filing cabinets and restricted access to offices), organizational (e.g., security clearances and limited access) and technical measures (e.g., use of passwords and encryption).
- Dispose or destroy personal information after intended use to prevent unauthorized parties from gaining access to the information.

10 See the brochure on *Gathering and Managing Sensitive Information* available at <https://mihr.ca/inclusion-diversity/mining-edi-supports> for more recommendations.

11 Office of the Privacy Commissioner of Canada, Interpretation Bulletin: Safeguards.



TSM EDI Protocol, Indicator 3: MONITORING, PERFORMANCE AND REPORTING (Facility Criteria)

LEVEL AA CRITERIA

LEVEL AA

CRITERIA 1

PUBLIC REPORTING

Prior to publicly reporting on information related to equitable, diverse and inclusive workplaces, a facility will identify the qualitative and/or quantitative data pieces to be collected, analyzed and reported. Ongoing monitoring of the identified data elements will allow for facility benchmarking and goal setting.

LEVEL AA

CRITERIA 2

PERFORMANCE OBJECTIVES

When a facility sets performance objectives related to equitable, diverse and inclusive workplaces or applies those at the corporate level, it demonstrates an advanced commitment to EDI. A holistic approach to setting performance

objectives will address the three key areas: equity, diversity and inclusion.¹² Examples of performance objectives for each of these include:

- Equity – all staff to complete mandatory AODA/Human Rights training.
- Diversity – decreasing harassment and discrimination issues and reports.
- Inclusion – develop and activate recruitment strategies to increase applications from underrepresented groups.

A sample framework for EDI performance objective setting is the Canadian Centre for Diversity and Inclusion's Toolkit for Developing a Diversity and Inclusion Strategy.¹³

LEVEL AA

CRITERIA 2A

COLLABORATION

Engaging and collaborating with local rights holding communities and underrepresented groups will help to set employment objectives that are relevant and achievable. Involving a cross-section of individuals who bring diverse perspectives and experiences, including union/employee representatives and communities of interest¹⁴ is a holistic approach to gathering input.

LEVEL AA

CRITERIA 2B

ACTION PLANS

Once objectives are set, action plans to meet the objectives are created to detail the next steps and processes that will foster a workplace culture of equity, diversity and inclusion. See the Guide to Putting EDI into Action for advice on creating relevant and realistic action plans.

LEVEL AA

CRITERIA 2C

DEMONSTRATION OF PROGRESS

Tracking and monitoring facility progress toward the performance objectives enables the demonstration of said progress. Internal reporting of how well and in what ways the facility is meeting its objectives and where any gaps lie helps keep management and workers engaged in ongoing efforts.¹⁵

Evidence-based qualitative and quantitative measures are useful in capturing the status of a facility's EDI journey. Data can be interpreted in different ways, and sometimes in ways that were not intended. Providing a broad picture of EDI within the facility by using a variety of data types helps to avoid misinterpretation. Further, finding ways to protect confidentiality and privacy while collecting and managing personal information is critical to setting the stage for workers to be honest and to provide authentic input.

Review the facility EDI plans to ensure they are aligned with the key objectives of the organization. Reporting on the performance of EDI objectives should be more than just a checklist of activities. For example, a facility that usually lists 'community involvement' as a goal and then reports on all relevant community activities, could consider implementing a brief pre- and post-survey with workers and/or community organizations to determine the short- and long-term impacts of participating in the community event.

12 See the *Guide to Developing a Corporate EDI Strategy* available at <https://mihr.ca/inclusion-diversity/mining-edi-supports> for a discussion of objective setting.

13 Canadian Centre for Diversity and Inclusion, *Locking in Your Leadership*.

14 See the *Guide to Community Identity and Collaboration* available at <https://mihr.ca/inclusion-diversity/mining-edi-supports> for more information.

15 See the *Guide to Developing a Corporate EDI Strategy* available at <https://mihr.ca/inclusion-diversity/mining-edi-supports> for a discussion of communications.



TSM EDI Protocol, Indicator 3: MONITORING, PERFORMANCE AND REPORTING (Corporate Criteria)

LEVEL AAA CRITERIA

LEVEL AAA CRITERIA 1

PUBLIC REPORTING

Prior to publicly reporting on information related to equitable, diverse and inclusive workplaces, a facility will identify the qualitative and/or quantitative data pieces to be collected, analyzed and reported. Ongoing monitoring of the identified data elements will allow for facility benchmarking and goal setting.

Conclusion

This Guide to Monitoring and Reporting EDI Performance supports mining facilities in the implementation of their efforts to meet the standards set out in the TSM Equitable, Diverse and Inclusive Workplaces Protocol. It builds on organizational efforts to develop a corporate EDI strategy and facility-level efforts to establish effective practices to foster a workplace culture of equity, diversity and inclusion. The focus on data collection and support for reporting against performance objectives reflects the natural evolution within a facility as it develops a workplace culture that is equitable, diverse and inclusive.

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Why monitor and report on EDI efforts?

To provide evidence of:

To be effective, monitoring and reporting efforts should address these central questions:

The meaningful advancement of EDI within the organization.

Is a robust commitment to EDI evident in our workplace and how is it linked to our core function(s)?

The effectiveness and impact of EDI strategies and activities.

How are our strategies and activities helping us to achieve our EDI goals/objectives?

The nature and extent to which EDI efforts are integrated within organizational operations and culture.

Is EDI integrated into organizational structures, processes, roles, culture and responsibilities?

Whether a corporate EDI strategy is accomplishing its objectives and to point to next steps.

Are our EDI efforts aligned? (i.e., commitment → goals/objectives → strategies/activities → outcomes/impacts → organizational vision)

A Cycle of EDI Monitoring & Reporting

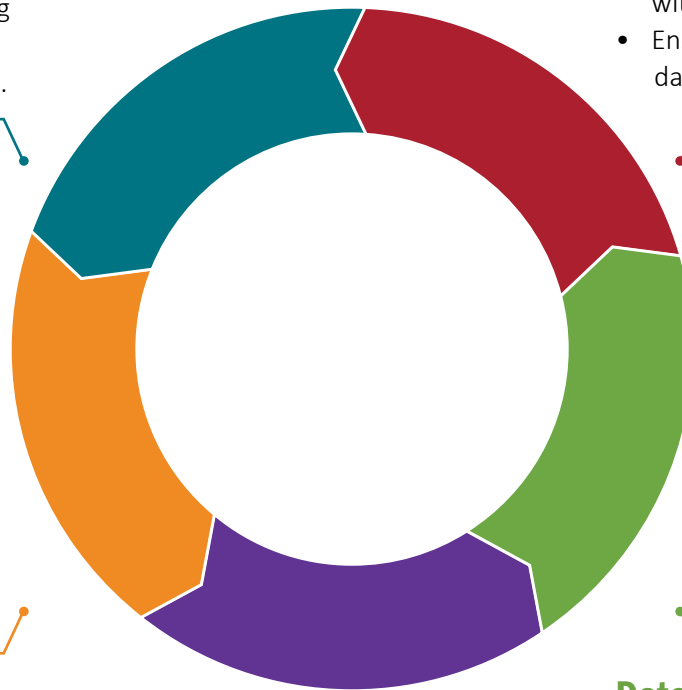
At the mining facility or site level, a continuous cycle of monitoring and reporting will help show progress toward meeting the corporate EDI commitment:

Engagement

- Seek input, feedback and/or advice from diverse internal and external communities of interest to build confidence, trust and transparency for participants and reporting audiences as well as continuous improvement.

Demographic Diversity

- Select the identity factors related to workforce diversity to be tracked over time, such as gender, member of racialized group/visible minority,* Indigenous identity, or person with a disability.
- Ensure participation in data-gathering is voluntary.



Reporting

- Track performance results against objectives, build for longer term analysis.
- Share results internally to build confidence in process, maintain engagement, facilitate individual and collective connection to respectful culture and EDI plans/strategy.

Performance

- Demonstrate impact of efforts and how objectives are met.
- Evaluate effectiveness of activities.
- Monitor progress of plans, identify gaps.
- Identify patterns or trends.

Data Management

- Identify qualitative and quantitative data indicators.
- Comply with relevant privacy laws.
- Obtain informed consent.
- Share why and how data will be collected and stored safely.
- Maintain confidentiality, anonymity.

* The term 'visible minority' is used by the government of Canada; while it corresponds to the Employment Act, currently under review, it is outdated and can be imprecise in a general context

Factors to Consider When Monitoring and Reporting on EDI Progress



What does diversity mean in our organization?

What is the nature/extent of demographic diversity within our current talent pool?



How is the scope of measurement data defined?

What qualitative and quantitative indicators will help us to evaluate effectiveness of processes regarding: engaging diverse stakeholders; achieving a workplace culture of EDI; addressing inequities and bias in people management; achieving a representative workforce; enhancing EDI awareness/capacity; communicating our EDI commitment, objectives, strategies and effectiveness and achieving our performance objectives.



What tools can help assess our EDI objectives?

What research methods can we use to achieve these indicators? (e.g., focus groups, survey, interviews, tracking existing activities).



How and to whom will results be reported?

In addition to inclusive, accessible, culturally-appropriate communications, what methods are most effective when engaging diverse communities of interest, workers, the public and corporate leaders, including the Board?



Have diverse perspectives been engaged?

How can we ensure that our research/data-gathering is reliable, valid and ethical, as well as effective in engaging people with diverse perspectives/experiences?



What are the relevant legislated requirements regarding protection of privacy and how will these be satisfied?

How are privacy, confidentiality, voluntary participation and anonymity maintained when gathering data, sharing information, reporting results and storing data safely?