

**Equity Without Evidence? Analysis of the City of Toronto's
Action Plan to Confront Anti-Black Racism**

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GS/PPAL 6230 - Topics in Public Policy

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May 15, 2025

Abstract

This study examines the extent to which the “Job Opportunities & Income Supports” section of the City of Toronto’s *Action Plan to Confront Anti-Black Racism* defines and measures progress in improving employment and economic opportunities outcomes for Black Torontonians. Using 38 City reports and documents from 2017 to 2024, the study uses an evaluative, qualitative analysis supported by NVivo coding to evaluate clarity, transparency, and empirical verifiability. The study finds that while Toronto’s Action Plan reflects institutional commitment and public accountability, it lacks standardized evaluation frameworks and measurable outcome indicators necessary for verifying long-term impact. Although this reflects broader gaps in municipal DEI practices, it does not suggest a lack of progress. Instead, it highlights the evolving nature of equity work and the need for stronger tools to track and sustain change. Recommendations include developing standardized outcome indicators, enhancing data transparency, and utilizing standardized evaluation approaches to more effectively measure the impacts of equity over time.

Acknowledgments

To my children, Madeline and Lucas - you are my reason for everything. I hope this journey shows you that learning never ends, and that through commitment and care, we can create meaningful change. This degree is as much yours as it is mine.

To my partner Chris, thank you for your unwavering support. Your care in managing our home and nurturing our children made it possible for me to devote time and energy to this work. Your love and partnership created the privilege that made this journey achievable.

To my parents, அம்மா, அப்பா, thank you for your prayers and for helping me quite literally cross an ocean to get here today.

To Dr. Couto, thank you for encouraging me to apply to the MPPAL program and for handling my personal circumstances with confidentiality, kindness, and sensitivity.

To Dr. Spotton Visano, your invaluable insights and direction helped me navigate this paper and stay on topic.

I extend my gratitude to all the professors who broadened my knowledge and helped shape my critical perspective throughout this degree.

To Sarah Klein, I am grateful for the space you offered to share ideas and for the thoughtful, critical feedback that pushed my thinking further. To my MPPAL cohort, thank you for your thoughtful engagement, feedback, and conversation. Your contributions strengthened my learning in and beyond the classroom.

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List of Abbreviations

AODA: Accessibility for Ontarians with Disabilities Act

BIPOC: Black, Indigenous, and People of Colour

CABR: Confronting Anti-Black Racism (City of Toronto Action Plan and related initiatives)

DEI: Diversity, Equity, and Inclusion

GBA+: Gender-Based Analysis Plus

OKRs: Objectives and Key Results

PAC: Partnership and Accountability Circle

SMART: Specific, Measurable, Achievable, Relevant, and Time-bound (goal-setting framework)

Introduction

In Canada and broadly within North America, people's lived experiences, research studies, and theories confirm that social inequities, like gender-based wage gaps and race-based disparities in income and incarceration rates, continue to persist, leading to adverse outcomes for historically and presently marginalized communities. While there is consensus on the need to address these inequities, peer-reviewed literature is divided on the effectiveness of interventions aimed at addressing them. Diversity, Equity and Inclusion (DEI)¹ interventions, some specific and targeted, others broad and aspirational, and some a blend of both, have been adopted across public and private sectors for various reasons, including addressing systemic inequities, reducing employee turnover, and attracting talent.

Although some research suggests that some DEI interventions lead to improved outcomes,² like increased workforce representation and economic mobility for marginalized groups, critics argue that empirical evidence (surveys, interviews, longitudinal data via verified government and independent sources, etc.) on the impact of many such interventions is limited, inconsistent, and often inconclusive. Additionally, skepticism persists whether the short-term gains associated with some interventions are sustainable or translate into long-term systemic change.

¹ For brevity, this study buckets interventions (initiatives, strategies, plans, and programs) that seek to address inequities under the Diversity, Equity, and Inclusion (DEI) umbrella term.

² Outputs refer to the immediate activities or products delivered by a program (e.g., number of people trained, or events held). Outcomes describe the short- to medium-term changes resulting from those outputs, such as increased employment rates or improved service access. Impacts refer to long-term, systemic changes, such as reduced poverty or decreased racial disparities in income or incarceration.

Background

Despite growing recognition of systemic anti-Black racism in Canada, Black communities continue to face disparities in income, employment, and access to opportunity in comparison to white and non-racialized populations (Ontario Human Rights Commission, 2025; Statistics Canada, 2022; Adamu, 2024). In response, various levels of government have introduced interventions aimed at addressing some of these disparities. For example, at the federal level, interventions include legislative and policy measures such as the *Employment Equity Act* (1995) and the Gender-Based Analysis Plus (GBA+) policy framework (Women and Gender Equality Canada, 2024), to promote equity across federally regulated sectors. Provincially, Ontario has passed the *Anti-Racism Act* (2017), which mandates the collection of race-based data and the development of anti-racism strategies within sectors like child welfare and policing. At the municipal level, cities like Toronto have adopted strategic plans like the *Action Plan to Confront Anti-Black Racism* (2017), which outlines commitments to reduce systemic barriers in areas such as employment, policing, and service delivery. While these interventions signal commitment to equity, their implementation has been uneven and, in some cases, inconsistent across levels of government, institutions like ministries and school boards, and sectors like policing (Cameron & Tedds, 2023; Gintova, 2023; Ersen & Hankivsky, 2021). For example, while the federal government tracks employment equity by race, gender, Indigeneity and disability in federally regulated sectors, and Ontario mandates race-based data collection under the *Anti-Racism Act* for sectors like child welfare and education; the literature on GBA+ and anti-racism interventions in the public sector highlights implementation challenges, including inconsistent application, limited accountability, the lack of clearly defined indicators of progress, and inconsistent data

collection and public reporting (Cameron & Tedds, 2023; Gintova, 2023; Ersen & Hankivsky, 2021).

As it pertains to municipalities, the level of government most directly connected to communities for developing and implementing interventions that respond to specific local needs, there is a notable gap in peer-reviewed literature evaluating municipal-level DEI interventions within the Canadian context. The lack of evaluation-focused studies makes it difficult to determine whether municipal strategies face the same implementation challenges seen at the federal and provincial levels. Furthermore, there is limited research assessing whether municipal DEI plans include clear indicators, track progress over time, or produce results that are verifiable and accessible to the public.

Rationale For Research

Employment and economic opportunities³ are useful areas for assessing the impact of DEI interventions, given that these are closely connected to outcomes like income security and access to social resources like housing, education and training. For Black communities, disparities in employment access, income, and opportunities are well-documented and remain indicators of broader patterns of systemic inequities (Adamu, 2024; Statistics Canada, 2022). The City of Toronto's *Action Plan to Confront Anti-Black Racism* (Action Plan) is one of the earliest and most visible municipal equity strategies in Canada. Among its five pillars, the "Job Opportunities & Income Supports" section outlines actions related to employment, youth training, and

³ Employment refers to access to stable, fairly compensated jobs with opportunities for advancement, while economic opportunity refers to broader access to training, entrepreneurship, business support, and public investment that allows for long-term financial security and mobility.

economic opportunity for Black Torontonians. While the City has issued progress reports, the extent to which these indicators of progress are clearly defined, measurable, and available to the public for accountability and transparency has not been systematically evaluated.

Research Question

This study assesses the extent to which the City's publicly reported data on employment and economic initiatives for Black Torontonians is empirically verifiable, based on the presence of clear, defined and measurable indicators of progress, alignment with official employment statistics, consistency in reporting over time, and transparency in data collection methods and sources.

Overview of the Study

This paper is structured to examine critiques of DEI interventions in municipalities by assessing whether they move beyond aspirational commitments and can be evaluated through clear, measurable, and transparent outcomes. This approach is anchored in the rationale that DEI strategies in the public sector must not only articulate equity goals but also demonstrate accountability using established evaluation frameworks. This paper analyzes a specific municipal case to assess the clarity, tracking, and verification of equity commitments in practice.

The literature review builds the foundation for this assessment by defining key terms and situating social equity within public administration. It identifies systemic racial and economic disparities, particularly those affecting Black Torontonians, and highlights how these disparities justify the need for robust, accountable DEI intervention. This section also introduces key debates in the literature around how effectiveness in DEI initiatives is defined and measured, providing the case for evaluating Toronto's Action Plan.

The methodology provides rationale for a qualitative case study of the Action Plan and outlines how thematic analysis was used to assess employment-related commitments. It also outlines the rationale for the evaluation criteria, including clarity and measurability, monitoring and reporting, and empirical verifiability, which are commonly employed in both the public and private sectors and supported by the literature on program and policy evaluation. This approach to the study examines how equity initiatives may be structured in ways that allow their outcomes to be assessed. The findings and analysis section applies this evaluative framework to several City documents, critically assessing whether the City has created the conditions to evaluate and improve its DEI interventions. The discussion builds on these findings to make a broader argument about the potential and limitations of municipal DEI interventions.

Literature Review

This literature review explores the theoretical and practical challenges of defining, measuring, and empirically verifying DEI interventions at the municipal level. Drawing on academic and gray literature, the review focuses specifically on external-facing municipal DEI interventions (those aimed at addressing systemic inequities in the broader community, rather than internal workforce-focused strategies).⁴ This review focuses on indicators, data collection, transparency, and consistent measurement as critical factors in assessing the effectiveness and accountability of municipal external-facing DEI interventions.

⁴ Internal DEI plans are those focused on municipal hiring, retention, promotion, and workplace culture, due to time and scope limitation, this review is limited to external-facing DEI interventions that address systemic inequities in the broader community.

Defining Diversity, Equity, and Inclusion

Diversity refers to the presence of sociodemographic differences among people, including gender, race, ethnicity, culture, religion, age, education level, political affiliation, income, and other characteristics (Hoang et al., 2022; Lundy et al., 2021; Newman et al., 2023; Soni, 2000). These factors shape individual and group access to power, resources and opportunities within society. Inclusion refers to the intentional efforts to ensure fairness and belonging within organizations, communities and broader society (*Ethical Principles in Planning*, 1992; Loh et al., 2022; Newman et al., 2023, p. 626; Husar Holmes et al., 2023). Ferdman et al. (2010) describe inclusion as creating spaces where individuals feel safe and fully engaged while being recognized for their unique social identities (Newman et al., 2023, p. 629). This means individuals feel safe expressing their authentic selves within the workplaces and communities where they live. Equity refers to creating fairness and aims for all social groups to have equal opportunities for success and protection from oppression (Hoang et al., 2022; McGowan & Ng, 2016; Newman et al., 2023; Johnson & Svara, 2015; Newman et al., 2023, p. 627). Within public administrations, achieving fairness in outcomes means dismantling systemic oppressions like racism by reducing racial disparities in public institutions, including education, healthcare, and policing (Newman et al., 2023, p. 625; McCandless et al., 2022). In this context, DEI interventions in the public sector are designed to transform institutions and communities by dismantling systemic barriers, promoting fairness, and creating inclusive conditions in which all individuals can thrive.

Social Equity in Public Administration

The concept of social equity has evolved significantly over time, rooted in philosophical thought dating back to John Rawls (1971) and legal frameworks intended to address systemic inequities.

Frederickson (1990) introduced social equity as a core public administration service, arguing it is equally important as efficiency, economy, and effectiveness in public-sector institutions.

According to Frederickson, equity transcends the notion of equality, which focuses on treating all citizens the same, by advocating for resource adjustments to achieve fairness so that, as Frederickson states, "citizen A is made equal with citizen B" (1990, p. 229). Therefore, social equity refers to the fair redistribution of public resources, opportunities, and services, taking into account historical and structural inequities and inequalities.

Frederickson critically noted that public sector standards prevalent through the late 20th century inadequately addressed citizens' diverse social and economic contexts, inadvertently reinforcing existing inequalities (1990). This idea is echoed by many social justice groups today, which seek justice and fairness by redistributing public goods and services. Frederickson's work is foundational for contemporary discussions on DEI, highlighting the need for public sector administrations to go beyond merely meeting legal obligations under legislation such as the *Ontario Human Rights Code* (1990) or the *Accessibility for Ontarians with Disabilities Act* (2005), and beyond symbolic gestures, to meaningfully engage with and address the specific needs of marginalized and equity-denied communities (Frederickson, 1990).

Systemic Inequalities in Canada

Systemic inequalities in North America, specifically in Canada, are linked to its history of colonization and slavery that imported many social, class, structural, and systemic inequities across various dimensions, including class, gender, and socioeconomic status. Despite Canada's international reputation as an inclusive society, significant disparities between social groups persist. Indigenous communities, for example, face profound disadvantages in health, education, and economic opportunities compared to non-Indigenous Canadians (Public Health Agency of

Canada, 2018; Indigenous Services Canada, 2023; Statistics Canada, 2024). The Ontario Human Rights Commission in 2005 and 2025 and the Canadian Human Rights Commission in 2023 noted that racialized groups experience discrimination in employment and housing, leading to persistently higher rates of poverty and unemployment, which are compounded by identity factors like gender and sexual orientation. For example, existing gender inequalities become compounded as they intersect with race to produce additional barriers in the workplace and underrepresentation in leadership roles. These systemic issues are often perpetuated by institutions and public sector organizations like schools, hospitals, police services, and municipalities whose practices and policies fail to address the systemic and structural inequalities faced by diverse and marginalized populations (Bernard & Smith, 2018; Etowa & Keddy, 2009; Mullings et al., 2016; Wortley, 2003). Identifying and addressing these inequalities requires a concerted effort to implement equitable policies, promote diversity, and ensure that all individuals have access to the resources and opportunities necessary for success. A particularly relevant example of these systemic disparities is that many Black Canadians, including those with high levels of education and qualifications, continue to face barriers to stable employment and fair wages (Statistics Canada, 2022; Adamu, 2024). These barriers are not individual but structural, rooted in racism across hiring practices, workplace cultures, and access to advancement.

Employment and Economic Data for Black Communities

The employment experiences of Black Canadians must be understood in relation to long-standing structural barriers, including racism and discrimination in hiring, pay, and advancement. The history of Black Canadians in the labour market is connected to the legacy of slavery, colonialism, and systemic racism. Adams (2011) notes that though slavery was abolished in

Canada in 1834, it continued to marginalize Black Canadians and limit them to low-skilled, low-paying jobs. The historical and ongoing marginalization of Black Canadians can be seen in the disparities in employment opportunities and outcomes for Black Canadians (Branker, 2017a; Briggs, 2018). For example, employment data for Black Canadians shows earning gaps between Black and white workers (Fearon & Wald, 2011; Adams & Flores, 2022). A study by Briggs in 2018 revealed that second-generation Caribbean Black male youth face particularly high rates of unemployment and precarious employment, with 45% dropping out of high school and 52% working in precarious jobs. Similarly, a study by Adamu in 2024 showed that West African immigrants, despite their high levels of education and skills, often find themselves in marginalized positions due to racism and discrimination. Qualitative studies have documented experiences of racism and sexism in the workplace, with many Black workers reporting discrimination in hiring, promotion, and job retention (Branker, 2017b; Madut, 2019).

Canadian, Ontarian, Municipal Context

The Canadian public sector has been shaped by social justice movements, shifting population demographics, social norms, and evolving morals that have propelled legal reforms to address historical and ongoing discrimination. For example, Canada's legislative framework to support individual rights has shifted and evolved with key statutes like the *Canadian Bill of Rights* (1960), *Canadian Charter of Rights and Freedoms* (1982), *Canadian Human Rights Act* (1985), the *Employment Equity Act* (1995), and others, which established core protections against discrimination. More recent legislation, including the *Accessibility for Ontarians with Disabilities Act* (2005) and Ontario's *Anti-Racism Act* (2017), reflect ongoing commitments at the provincial level to support inclusive and accessible communities (Cameron & Tedds, 2023; Ersen & Hankivsky, 2021).

With increasing calls for social justice (Loh et al., 2022), municipalities have responded with a mix of reactive and proactive approaches, including statements, initiatives, plans, and policies aimed at addressing systemic inequities affecting historically marginalized or equity-denied groups (City of Vaughan, 2022; *Markham's Diversity and Eliminating Anti-Black Racism Action Plans*, 2022). While legislative mandates like the *Accessibility for Ontarians with Disabilities Act* (2005) establish baseline compliance requirements for all municipalities, those that adopt DEI-focused statements or formal plans may aim to move beyond legal obligations by outlining strategies to advance equity and inclusion within their communities (Anaduaka et al., 2024; Cao et al.; 2024; Castillo, 2022).

DEI Intervention Strategies in Canadian Municipalities

Municipal DEI plans typically focus on two areas: internal efforts aimed at workforce equity, and external strategies that seek to reduce systemic barriers in communities (Freidenvall & Ramberg, 2021; Feeney & Camarena, 2021; Cao et al., 2024; Castillo, 2022). This study and literature review are limited to external strategies.

External DEI interventions are not uniform or prescriptive and can take many forms, differing significantly across municipalities. For example, one city's plan may prioritize access to housing, while another may focus on improving public services or enhancing civic participation for historically marginalized or equity-denied communities (Good, 2019; Grewal, 2022; Larouche-LeBlanc, 2019; Harwood, 2022; Toussutti, 2017). Cities like Toronto, Edmonton, Calgary, and Vancouver have used multilingual consultations, cultural advisory boards, and targeted outreach to engage residents who are often excluded from municipal planning and decision-making (Zhuang, 2018; Harwood, 2022; Tossutti, 2023). Burnaby and New Westminster have developed policies specifically supporting LGBTQ2S and immigrant residents through inclusive

programming and targeted services (Bain & Podmore, 2022; Bhuyan & Leung, 2022). Targeted municipal policies in Quebec have shown promise in facilitating the integration of immigrant populations by building partnerships with community organizations and creating spaces for immigrant communities to participate in local decision-making (Larouche-LeBlanc, 2019). Municipalities like Toronto and Vancouver have also developed economic inclusion strategies by supporting minority-owned businesses, developing targeted cultural programs, and working to reduce barriers to employment for racialized and immigrant communities (Innovation, Science and Economic Development Canada, 2021; Newman et al., 2023; Harwood, 2022; Tossutti, 2023).

Criticisms of DEI in the Public Sector

DEI interventions in the Canadian public sector have faced criticism, some arguing that these programs and policies often fail to produce meaningful change (Armstrong, 2024; Andrews et al., 2017; Dover et al., 2020; Robb & Rana, 2024; Manning & Levac, 2022). One major critique is that DEI efforts frequently remain symbolic rather than transformative, serving as performative measures to enhance an organization's reputation rather than addressing systemic inequities (Levi & Fried, 2024; Dover et al., 2020; Naff & Kellough, 2023).

Tokenism continues to be a concern, where racialized individuals are appointed to visible positions without the decision-making power or institutional support to effect change (Asey, 2022; Kraus et al., 2022). Some researchers have also described "predatory DEI" practices, where equity-denied employees are expected to lead DEI work in addition to their regular roles, often without compensation, authority, or protection from harm, resulting in burnout (Alicea, 2024). Additionally, some studies suggest that DEI initiatives can produce unintended consequences, such as reinforcing stereotypes about the competence of underrepresented groups

or fostering exclusion among historically dominant groups (Dover et al., 2020; Iyer, 2022).

Critics also argue that DEI initiatives often fail to bring about structural change, as they tend to focus on short-term diversity metrics rather than addressing underlying power imbalances (Armstrong, 2024; Hellerstedt et al., 2023).

Despite public commitments to equity, Indigenous and Black public servants remain underrepresented in leadership roles, suggesting that many public sector DEI interventions are insufficient in addressing deeply embedded forms of exclusion (Gintova, 2023). As a result, these initiatives risk becoming superficial, diverting attention from the structural changes needed to address entrenched inequities. The criticisms of current DEI frameworks suggest the need for a more nuanced approach that considers intersectionality and the lived experiences of marginalized groups (Gintova, 2023; Ersen & Hankivsky, 2021; Manning & Levac, 2022).

Challenges in Evaluating DEI Plan Efficacy

Any effective strategy requires clear methodologies for data collection, analysis, interpretation, and application to ensure that insights inform decision-making, measure progress, and drive continuous improvement (Andrews et al., 2017). Regular evaluations that commit to producing publicly available reports provide transparency to both citizens and policymakers. Independent verification against official sources further enhances credibility and accountability (Andrew-Amofah et al., 2022; Bush, 2024).

Newman et al. (2023) emphasize that meaningful DEI plans should establish quantifiable objectives, with success indicators such as employment rates, income disparities, and equitable access to economic programs (Lang, 2020; Bush, 2024). For example, employment rates may serve as an indicator, particularly when disaggregated data help assess whether equity-deserving groups are proportionately represented across municipal departments or mirrors the demographic

profile of the broader community.⁵ Bush (2024) notes that indicators may be used to measure DEI progress, but they are not necessarily a measure of effectiveness. Carefully determined based on clearly articulated outcomes, these indicators may help assess whether DEI commitments are being translated into meaningful and sustained progress.

Examples of potential indicators for assessing municipal DEI interventions may include results from community satisfaction surveys that gauge perceptions of inclusion and belonging in municipal services. Other indicators may include the transparency and accessibility of disaggregated data shared with the public and dedicated financial and human resources to supporting DEI plans. Additional measures may include the presence of implementation plans with specific, measurable, and time-bound goals; clearly identified metrics for evaluating success; and regular, transparent reporting to municipal councils and the public.

Given that municipalities in Canada vary significantly in their approaches to transparency and data reporting, comparative evaluations between municipalities are difficult (Bain & Podmore, 2022). Although some municipalities implement robust measurement frameworks, including annual progress reports and detailed methodological explanations, others provide ambiguous or irregular reporting (Andrew-Amofah et al., 2022; Lang, 2020). DEI plans, including those explicitly aimed at employment and economic support for marginalized communities, face obstacles such as resource constraints, insufficient measurement frameworks, and resistance from stakeholders (Feeney & Camarena, 2021; Sabharwal, 2014). Without consistent data

⁵ Proportional representation should not be treated in absolute terms, given that structural barriers, labour market changes, and the availability of qualified professionals in a particular sector can all influence these outcomes

production and transparent reporting, municipalities fail to provide the necessary empirical evidence for meaningful comparisons and accountability (Lang, 2020). The absence of standardized evaluation practices makes it challenging to empirically verify the impact of DEI interventions, particularly in the areas of employment and economic opportunities. These challenges point to the need for structured evaluative approaches that can support accountability, transparency, and clearer goal setting in municipal equity work.

Evaluative Frameworks for Public Sectors

Frameworks such as SMART goals (Specific, Measurable, Achievable, Relevant, and Time-bound) and OKRs (Objectives and Key Results) have been used in Canadian public organizations to strengthen goal clarity, track outcomes, and improve alignment between stated priorities and measurable results (Doran, 1981; Doerr, 2018; Goh et al., 2015; Pollanen et al., 2017). These tools, originally developed in the private sector, have been adapted for use in public sector management to support accountability, particularly in areas such as service delivery and program implementation (Virani & van der Wal, 2023). Given that these well-established tools remain underutilized in municipal DEI interventions, many strategies contain aspirational language without specifying outputs, outcomes, timelines, or indicators of progress (Shepherd, 2022; Bourgeois & Whynot, 2018). As established literature on program evaluation emphasizes, especially in complex public sector contexts, evaluation must be embedded at the planning stage and anchored in established methods and methodologies that allow for accountability and continuous refinement through an iterative evaluation process (Newcomer et al., 2015; McDavid et al., 2018).

Methodology

This study is framed through a postpositivist and pragmatic paradigm. It recognizes that while quantitative data is essential for tracking outcomes, it must be contextualized with qualitative interpretation to understand its meaning and limitations. The postpositivist lens is used to assess employment-related indicators reported by the City of Toronto while also acknowledging potential bias and gaps in municipal reporting. The pragmatic approach supports a focus on practical outcomes, aiming to provide insight that is useful to municipalities working to implement or evaluate equity strategies.

The study also draws from critical race and feminist theory to examine how power and systemic inequality shape employment outcomes and access to economic opportunities for Black Torontonians. These frameworks inform the analysis of the City's policies, programs, and reporting practices, with a focus on how equity-denied groups are positioned or represented.

Analytical Framework

This study uses an evaluation-based analytical framework to assess how the “Job Opportunities & Income Supports” pillar of the Action Plan addresses employment equity for Black Torontonians. The framework guides content analysis by focusing on five key dimensions: clarity, measurability, consistency, transparency, and verifiability. These dimensions are drawn from strategic planning and public program evaluation literature and adapted to evaluate the design and reporting of municipal DEI interventions.

Three evaluation criteria structure the analysis. The first criterion focuses on whether the Action Plan includes clearly defined goals and measurable indicators of progress related to employment, job training, and economic opportunities for Black Torontonians. Indicators are examined for specificity, alignment with stated objectives, and the presence of timelines or quantifiable

targets. The second criterion evaluates whether the City of Toronto systematically tracks and publicly reports progress on its employment-related equity commitments. This includes assessing the consistency of reporting over time, the accessibility of reporting documents, and the extent to which reporting supports transparency and accountability. The third criterion addresses empirical verifiability by considering whether data presented by the City can be independently confirmed. It examines whether indicators are supported by referenced sources, whether data collection methodologies are described, and whether reported outcomes can be cross-referenced within and across municipal reports.

While this approach offers a method for evaluating the design and reporting of the Action Plan, the analysis does not include primary qualitative data such as interviews, focus groups, or community surveys. As a result, this study does not assess the lived impact or perceived outcomes of the Action Plan, which remains a limitation of its scope.

Research Design

This study uses a qualitative case study design to evaluate how Toronto's *Action Plan to Confront Anti-Black Racism* achieves its commitments in the "Job Opportunities & Income Supports" pillar. Toronto was selected for its demographic diversity, documented racial inequities, and its role as an early adopter of a municipal anti-Black racism plan. Using document analysis, the study applies the criteria outlined in the analytical framework to assess the design and reporting of employment-related DEI commitments. A full list of these commitments is included in Appendix A.

Document Selection

A total of 38 documents were collected through the [City of Toronto's Confronting Anti-Black Racism](#) website and the [Council minutes and agenda search portal](#). These include reports

submitted to Council (e.g., EC1.3, EX29.11), an interim plan, and appendices attached to submissions from 2017 to 2024. Only documents explicitly addressing the “Job Opportunities & Income Supports” pillar were included in the analysis. Communication items, such as public letters, attached to submissions were excluded. Refer to Appendix B for Document Selection Criteria and Appendix C for a list of documents.

Data Analysis and Coding

Documents were uploaded into NVivo software for qualitative content analysis. The three evaluation criteria outlined in the analytical framework were used to drive deductive coding. Text from the Action Plan and related reports that aligned with or contradicted these criteria was coded and categorized accordingly. Using NVivo’s intuitive pattern recognition function and inductive coding, additional codes were developed to identify and analyze emerging themes, including employment access, economic opportunity, job training, and municipal accountability. Documents were grouped into five reporting years and organized according to submission batches. Refer to Appendix D for detailed coding methods and sample outputs.

Data Categorization and Thematic Analysis

Once text was highlighted using the identified codes, it was thematically grouped and analyzed into “buckets.” The first area of analysis, indicator clarity and presence, included assessing whether employment-related metrics were included in the Action Plan or its updates, and whether those indicators were explicitly defined. The second area, monitoring and reporting practices, involved examining whether employment outputs and outcomes for Black Torontonians were systematically tracked and made publicly available, and whether employment data were reported consistently across documents and over the five-year period. The third area focused on measurement and evaluation, specifically whether specific benchmarks or metrics

were reported to assess progress, and whether reported outcomes could be verified using referenced attachments, internal documents, external documents, reliable databases, or independent audits. The fourth area of analysis determined the dimension of transparency by assessing whether data sources, methodologies, or supporting materials were disclosed and easily accessible.

Findings From Data Analysis

Clarity and Measurability of Indicators

The 2017 launch of the Action Plan (City of Toronto, 2017e, 2017f) laid the foundational framework, grounded in sound evidence and community engagement and contained clearly articulated goals, although some of these goals were ambiguous or vague. In general, goals lacked measurable performance indicators, particularly in the area of employment. The document and goals also lacked baseline measures, as well as a clear definition of success. For example, although the Action Plan articulates the need to “support inclusive hiring practices,” it does not define hiring targets, target populations (such as seniors, youth, or women), timelines, or baseline measures for existing hiring practices. The document presents a strategic vision without tangible, clearly articulated outcome measures (City of Toronto, 2017f). This absence of outcome-driven indicators reflects a disconnect between strategic intent and measurable accountability in employment equity for Black Torontonians, particularly in relation to the evaluation criterion concerning clarity and measurability.

In 2018, the attachment containing the preceding year’s annual work plan summary introduced more concrete outputs, which included two youth job fairs that reached 370 participants and the launch of a Black Youth Internship Initiative (City of Toronto, 2019e). Additionally, the City committed to developing a Disaggregated Race-Based Data Strategy to enable future

measurement (City of Toronto, 2019c). The initiatives listed focused on short-term deliverables and quantifying participation; however, they continued to lack defined, specific outcomes or measurable impacts on employment goals (City of Toronto, 2017g). These findings demonstrate some progress toward quantifiable outputs, such as program participation and internship placements, but continue to fall short of meeting the evaluation criterion related to clarity and measurability of employment-related outcomes. Specifically, outcomes such as increased employment rates for Black Torontonians, improved job retention or income levels, or reductions in disparities between Black and non-Black communities are not presented. The 2019 Update on the Action Plan continues this trend of qualitative commitments (City of Toronto, 2019f). Under the priority of “Building an Inclusive and Equitable Economy,” aspirational language is used without supporting metrics to measure advancement in employment access or equity for Black Torontonians. The continued absence of baseline data, performance targets, or indicators to track progress further reflects the gap in clearly defined and measurable commitments (City of Toronto, 2019c).

In 2020, implementation of the Action Plan progressed with employment-related programs, including achievements such as 82% of participants in one program securing further opportunities and over 1,000 Black youth receiving employment readiness training (City of Toronto, 2020e). The City also introduced tools like the Inclusive Recruitment Playbook and expanded staff training through Confronting Anti-Black Racism sessions (City of Toronto, 2020f). While this output data shows some advancement in tracking participation rates, there is no evidence of corresponding outcome metrics such as employment placement rates or job retention (City of Toronto, 2020c). These efforts align partially with the evaluation criterion

concerning clarity and measurability, showing increased effort toward defining program activity, but remain limited in demonstrating impact.

By 2022, the *Year Four Work Plan* demonstrated a more structured and quantifiable approach to program implementation, including investments in training, diverse supplier lists, and retention initiatives (City of Toronto, 2022e). For example, \$900,000 was invested to train 140 Black, Indigenous, and People of Colour (BIPOC) youth, and internal efforts through the Toronto Employment Satisfaction Survey engaged 112 Black staff (City of Toronto, 2022f). However, questions about the effectiveness of these efforts remain, as reports lack data on whether participants gained sustainable employment or whether engagement improved the retention of Black staff employed by the City (City of Toronto, 2022b). Although participation indicators remain strong, the lack of outcome measures limits the extent to which these initiatives satisfy the evaluation criteria related to measurability and verifiability.

The 2023 *Year Four Update* provides the clearest articulation of program outputs to date, including over 2,000 recreation workers trained, 60% Black participation in an artist mentorship program, and continued investment in Black business readiness (City of Toronto, 2023h, 2023f). Yet, these remain output measures without associated outcome indicators. Key metrics such as changes in Black employment rates or job retention are still missing. While City Council directed the development of a new 10-year plan with a formal evaluation framework by 2024, possibly in recognition of these shortcomings, the existing documentation continues to rely on process and participation data (City of Toronto, 2023e). These findings illustrate continued limitations in meeting the evaluation criteria related to outcome measurement and empirical verifiability.

Monitoring and Reporting Practices

The first draft of the Action Plan (City of Toronto, 2017e, 2017f) articulated the importance of employment equity and outlined a general timeline encompassing 2022; however, it did not include a framework for tracking progress or reporting publicly. The foundational document lacked performance indicators, evaluation plans, and mechanisms for accountability. For example, while the Interim Plan calls for the “collaborative development of multi-year work plans and a partnership model for implementation oversight,” it does not specify performance indicators or evaluation tools (City of Toronto, 2017f). The Final Plan similarly proposes annual reporting but does not outline how progress will be measured, stating only that City staff will “report annually on the progress of implementation and the next year’s work priorities” (City of Toronto, 2017i). Actions in the *2018 Work Plan*, such as the launch of a Black Youth Internship Initiative, are described in terms of activities rather than measurable outcomes (City of Toronto, 2017j). The language used in the document is predominantly visionary, such as leveraging “the talents, knowledge, and experiences of Black residents” to transform City services, without providing a clear evaluation framework on how it plans to achieve or measure this transformation (City of Toronto, 2017i). While the Action Plan is grounded in verifiable data from sources such as Statistics Canada, the document remains primarily aspirational in nature. These limitations reflect a gap in the Action Plan's monitoring and reporting practices, particularly with regard to how progress over time would be assessed and communicated. By 2018, the *Year One Work Plan* began to incorporate some internal tracking elements. Each action item was tagged with a status label (e.g., “complete,” “in-progress,” “revised”) to indicate whether the specified initiatives were achieved. Within the employment pillar, for example, the City reported that two Black youth were hired for five-month internships within the Confronting

Anti-Black Racism Unit, and that 370 youths participated in targeted employment events, including job fairs for those involved with the justice system (City of Toronto, 2019e). These updates were presented as status summaries rather than evidence of measurable outcomes. Documents intended for public reporting lacked evaluation frameworks and did not provide sufficient detail on the effectiveness or impact of these efforts. These early efforts represent some progress toward internal tracking but fall short of fulfilling the evaluation criterion concerning transparent and outcome-oriented public reporting.

The City's 2019 reporting reaffirmed its commitment to the Action Plan and demonstrated increased internal support and cross-collaboration, including launching the City Leads Circle and assembling staff across 22 City divisions (City of Toronto, 2019c). Reporting remained primarily descriptive, with a focus on community events, staff training, and internal engagement. Although these updates documented activities like hosting 53 public events and reaching over 3,800 participants, they lacked metrics indicating impact or change over time. Despite references to logic models and tracking tools, the documents did not include public benchmarks or outcome indicators. The absence of structured mechanisms for evaluating or comparing progress across years or against baseline data continued to limit the City's ability to demonstrate accountability. In 2020, the City's reporting included more detailed information on employment-focused outputs and cross-departmental collaboration. The *Year Two Action Plan Summary* reported that 1,012 Black youth received employment readiness training, with 82% of one cohort accessing additional leadership or employment opportunities (City of Toronto, 2020e). The Confronting Anti-Black Racism Unit's corporate training initiative also scaled significantly, reaching 8,838 City staff through 175 sessions, including nearly 50% of senior management (City of Toronto, 2020c). These examples reflect an effort to document implementation and quantitatively describe

program reach. Yet, reporting continued to emphasize outputs, such as the number of participants trained, without connecting them to outcomes, including job retention and career advancement. Despite references to an “Ubuntu framework” guiding the evaluation, no formal methodologies, outcome indicators, or data analysis strategies were made public. These developments suggest an increasing focus on internal tracking, but the lack of outcome metrics limits alignment with the evaluation criteria related to robust monitoring and reporting.

By 2022, the *Year Four Work Plan* and the *Partnership and Accountability Circle (PAC) Report* demonstrated a more structured approach to implementation tracking. The Work Plan outlined deliverables categorized by thematic priorities (e.g., Inclusive Economic Development, Accessible and Equitable Housing) and included detailed activity updates from various City divisions (City of Toronto, 2022e). The City also reported that 48% of Year Four Activities were marked complete, introducing a more formulaic process for tracking progress (City of Toronto, 2022f). Initiatives included mentorship and career training programs for Black youth, as well as targeted outreach to Black-owned businesses.

The PAC played a significant accountability role by providing feedback on program implementation, identifying equity gaps, and flagging systemic challenges. For example, PAC members acknowledged improvements in Black staff recruitment and anti-Black racism training but also called for increased representation in senior leadership and more sustained investment in community-rooted solutions (City of Toronto, 2022b). The use of structured appendices to break down progress by division, theme, and priority area improved the clarity of reporting; however, outcome indicators and evaluation frameworks remained limited. These reports illustrate a shift toward more evaluative public reporting, with increased documentation and engagement, yet

they continue to fall short of fully meeting the evaluation criterion related to consistent, outcome-oriented monitoring and public accountability.

The *2023 Year Four Update* represents the most comprehensive year of public reporting to date (City of Toronto, 2023e). The report confirmed that 80% of the Action Plan's recommendations had been implemented, and 48% of Year Four activities were marked complete, with the remaining 52% in progress (City of Toronto, 2023h). Activities were documented thematically and categorized by implementation status, with targeted completion dates provided. For instance, Parks, Forestry & Recreation hired 2,329 youth recreation workers, and Economic Development supported six Black arts agencies through mentorship and funding (City of Toronto, 2023h). The report included five appendices detailing progress summaries, a Year Five work plan, a PAC feedback report, and divisional anti-Black racism action plans (City of Toronto, 2023a, 2023b, 2023c, 2023g, 2023h). In addition, City Council formally directed staff to review the outcomes of the five-year plan and begin developing a new ten-year strategy, signalling a long-term commitment to evaluation. While these developments reflect more structured tracking and planning, formal outcome metrics and evaluation methodologies remained underdeveloped or not publicly available. The 2023 reporting shows significant progress toward meeting the evaluation criterion related to monitoring and reporting, particularly in structured documentation and process transparency, but outcome evaluation remains limited.

Empirical Verifiability of Data

The City's approach to data transparency and empirical verifiability in its implementation of the Action Plan evolved between 2017 and 2023; however, systematic and consistent evaluation methods, along with outcome data connected to verifiable sources, remain limited. The initial 2017 Action Plan outlined broad employment and economic recommendations but did not

establish a framework for collecting or verifying employment data (City of Toronto, 2017e, 2017f). There was no reference to datasets, particularly those disaggregated by race, no defined baselines, and no mention of partnerships with trusted agencies such as Statistics Canada. These omissions reflect an early lack of attention to data verification and external validation, which limits the Plan's empirical verifiability.

In 2018, the *Year One Work Plan Summary* introduced simple status tracking indicators such as “complete” and “in-progress,” which offered implementation updates for each action (City of Toronto, 2019e); although, the criteria for marking actions as complete were not clearly defined or tied to measurable outcomes, and independent data sources were not referenced. While outputs were reported, they were not linked to verifiable benchmarks or supported by external evidence. By 2019, the *Year Two Work Plan Priorities* attachment remained largely descriptive. Though there was evidence of increased cross-departmental collaboration and community consultation, outcome indicators and consistent evaluation tools were still not included. The Plan described activities such as staff training and partnership meetings, but it offered no cross-checkable data, indicators for success, or an explanation of evaluation methods. These gaps continued to limit empirical verifiability.

In 2020, the *Year Three Update* and attached presentation began to include more quantifiable statistics, such as the training of 1,012 Black youth, with 82% of one cohort reportedly accessing further opportunities (City of Toronto, 2020b). Still, no explanation was provided for how this percentage was calculated, what qualified as “access to opportunities,” or how success was defined. Common evaluation methods and supporting data sources were not included. The *PAC Report* that year identified structural challenges facing the Action Plan and Black Torontonians but did not reference independent or government datasets, external audits, or third-party

evaluations. Although the inclusion of some quantitative data suggests progress, the absence of evaluation methods and clearly defined outcomes continued to limit verifiability (City of Toronto, 2020f).

A more structured reporting format emerged in 2022. The *Year Four Summary* attachment introduced consistent tracking of action items (e.g., 48% marked complete, 52% in-progress), and the reporting format assigned responsibilities to City divisions and thematic areas such as economic development and employment (City of Toronto, 2022f). The *PAC Report* also referenced verifiable data, including a 79% COVID-19 hospitalization rate among Black Torontonians and a 28.4% food insecurity rate in Black households, citing Toronto Public Health and the Black Food Sovereignty Plan (City of Toronto, 2022b), yet this data was not integrated into the assessment of the progress of the Action Plan. Verifiable data sources were not used to track progress or assess challenges. While this reporting shows movement toward improved data transparency, it still fell short of meeting the evaluation criterion for empirical verifiability due to the continued absence of baseline data, output indicators, and outcome evaluation methods.

The 2023 report and attachments demonstrated a stronger use of data-supported reporting. The report confirmed that 80% of the Action Plan's recommendations had been implemented (City of Toronto, 2023e), and Year Four activity statuses were categorized by theme, with responsibilities assigned to various City divisions (City of Toronto, 2023h). The City also reported that 2,329 youth recreation workers had been trained and that \$1.8 million had been invested in Black-led initiatives (City of Toronto, 2023d; 2023h). The attached *PAC Report* acknowledged increased race-based disaggregated data collection across several divisions, including its application in policing and service delivery (City of Toronto, 2023c). City Council formally directed staff to conduct a five-year outcome review and develop a ten-year action plan, signalling a shift toward

more consistent evaluation. Despite these advances, performance claims such as “82% employment success rate” remain vague and unverified, as there is no mention of independent audits or reliable datasets that can be cross-referenced. Although the City is making progress toward improved data-informed reporting, empirical verifiability remains limited by the absence of standardized evaluation frameworks and publicly traceable methodologies.

Discussion

The Action Plan represents a meaningful municipal effort to advance community-facing DEI initiatives, specifically targeting systemic employment and economic disparities experienced by Black Torontonians. Rooted in commitment to racial equity, the Action Plan is in alignment with equity definitions from the literature, particularly those articulated by Frederickson (1990) and Newman et al. (2023), which emphasize fairness over formal equality and highlight the redistribution of resources as a necessary action to advance social equity. The Action Plan’s stated commitment to a SMART (specific, measurable, achievable, relevant, timebound) framework also aligns with best practices in public administration by establishing a structure that aspires to clarity, measurability, and timeliness. As the data analysis notes, the implementation documents and annual reports reveal a notable gap between the vision and intent, and measurable outcomes, reflecting limitations in areas of clarity and measurability.

Consistent with critiques in the literature (Lang, 2020; Andrew-Amofah et al., 2022), the Action Plan clearly articulates who (Black youth, Black business owners, and Black service recipients) should benefit from its initiatives but fails to define how much change to expect or by when. Despite the Action Plan’s frequent use of relevant goals and articulated strategic focus, most employment and economic-support-related initiatives do not include quantifiable targets or baseline data. Instead, progress has largely been tracked through activity-based outputs like the

number of people trained or events held rather than outcomes like an increase in employment or retention. This aligns with concerns raised in the literature that municipal DEI plans often struggle with translating qualitative commitments into quantifiable indicators (Bush, 2024; Newman et al., 2023). While progress was evident in the increased volume and visibility of employment readiness and training efforts between 2018 and 2023, the lack of reported outcome measures limits the ability to empirically verify whether the initiatives led to economic advancement for Black communities. For example, the City may examine and report on how long participants in City-sponsored employment programs remain in their roles, and whether this is sustained or increased from baseline measurements year over year. Another concrete example may be to examine if greater representation of Black workers across different sectors, like the City's own employment data, or art or technical fields, where City programs have made direct connections to effect change. The City may also examine if promotions or wage increases are present among participants in mentorship or training programs it established or supported.

With regard to monitoring and reporting, the Action Plan's reporting by the Confronting Anti-Black Racism Unit, annual reports to Council, and PAC show institutional accountability and commitment to transparency. These bodies reflect the accountability mechanisms noted in literature, which advocate for transparent, regular reporting to the public and shared oversight with community partners (Harwood, 2022). The literature notes that many municipal DEI plans tend to fall into performative cycles, producing aspirational statements without effective accountability mechanisms (Levi & Fried, 2024; Alicea, 2024). In Toronto's case, while formal structures for public accountability are present and consistently used, as evidenced by detailed Council reports and community feedback, the lack of uniformity in reporting methods across City divisions and the absence of a standardized evaluation framework mean it is only partially

aligned with best practices. These limitations are noted by PAC, which calls for clearer employment metrics, particularly for youth with criminal records. While it is commendable that Toronto's reporting practices advance institutional transparency, they also support findings from the literature that, with inconsistent or limited evaluation methods, it becomes difficult to assess or compare outcomes over time or across municipalities (Bain & Podmore, 2022; Lang, 2020). Although the Action Plan is rooted in verifiable historical data, including 41 years of community reports and systemic reviews and includes verifiable baseline statistics like disproportionate unemployment rates for Black residents, its implementation reports lack empirical evaluation tools. Given that City reports recognize and establish the need for race-based disaggregated data collection, there is alignment with the literature to build robust data infrastructure to support DEI evaluation (Newman et al., 2023; Andrew-Amofah et al., 2022). The slow progress toward these goals does not signify failure but rather indicates that data governance and collection infrastructure must be set up across City divisions as well as within community agencies and organizations in order to meaningfully realize and utilize it. This requires technical resources, expertise, and time, which are likely being developed in parallel. The City's Data for Equity Strategy was approved in 2020 and includes a commitment to Black Community Data Governance (City of Toronto, 2024b, 2023j). Furthermore, the City's reports openly note the difficulty in measuring the outcome of some of the initiatives, especially given that community agencies are simply not equipped with staff and funding resources to collect and report such data. In fact, at the start of the Action Plan, the City itself had not set up the staffing, funding, and information infrastructure to do it. Between 2017 and 2022, the City built its internal capacity while also supporting the development of community capacity to implement the Action Plan.

While the persistent lack of cross-verifiable outcome data, independent audits, and detailed methodologies for evaluating reported success rates limits the empirical verifiability of the Action Plan's impact, it is by no means a condemnation of the work that was being progressed through City divisions and the community. While Toronto's DEI reporting echoes criticisms raised by Dover et al. (2020) and Armstrong (2024) that even well-intentioned initiatives can fall short of transformative change if they rely too heavily on descriptive outputs and self-reported implementation status without rigorous evidence of structural impact, the criticisms are limited, perhaps, in failing to understand that not everything can be quantifiably measured nor that without quantifiable measures, progress is not made. Although these findings point to limitations in empirical verifiability, they are not necessarily an indication of a lack of progress. Rather, they are a call for improvement in the City's reporting structures.

The Action Plan's progress, particularly in areas such as community-focused employment programs, mentorship efforts, and economic development supports, should not be discounted. These initiatives show alignment with best practices in externally facing DEI plans, as noted in the literature (Bhuyan & Leung, 2022; Tossutti, 2023). The documented investments in Black youth employment, arts mentorship, and Black business readiness indicate that the City has taken concrete steps toward addressing historically embedded inequities. While this study notes the importance of clear indicators, empirical verification, and standardized evaluation in municipal DEI initiatives, it is equally important to recognize that meaningful progress does not always rely on evaluation frameworks.

Social justice movements such as women's rights, LGBTQ+ advocacy, and disability justice have historically achieved significant legal and cultural milestones without the benefit of structured evaluation systems. Their success was often driven by grassroots mobilization, lived

experience, moral and ethical awakenings, and collective community action rather than measurable performance benchmarks. The development of formal evaluation frameworks is a more recent development, responding to increasing demands for accountability and measurable impact, particularly in the public sector. The findings of this study should not be interpreted as a suggestion that Toronto's Action Plan has failed or that progress has not been made. Rather, they reflect a call for ongoing refinement in how municipalities document, evaluate, and communicate that progress. A lack of standardized data should not be conflated with a lack of change; instead, it should be viewed as an opportunity to strengthen and reinforce the momentum already underway.

This study's findings related to clarity and measurability, monitoring and reporting, and empirical verifiability support existing critiques found in the literature. While Toronto's Action Plan advances the field by institutionalizing accountability, fostering community partnerships, and demonstrating transparency in reporting, it also reflects the limitations of municipal DEI frameworks that sometimes present as symbolic without measurable outcomes, transparent without standardized evaluation, and data-informed without cross-verifiable evidence. These limitations mirror frustrations in the literature and suggest a need for DEI strategies to be designed with measurability and accountability in mind. At the same time, elements of the Action Plan, including its community engagement, feedback mechanisms, and structured reporting efforts, demonstrate alignment with some best practices and indicate that the City is not simply engaging in symbolic work, but progressing toward sustained, systemic change. The development of the City's next ten-year strategy offers a critical opportunity to embed outcome indicators, strengthen intersectional analysis, and develop a replicable evaluation framework that can serve as a model for other municipalities in Ontario.

Recommendations for Future Research

This study considers the implications of its findings for both municipal DEI interventions and evaluation practice, noting the need for approaches that are meaningful, measurable, and sustainable. The City of Toronto's forthcoming ten-year plan presents a timely opportunity to model these practices in ways that could inform municipalities across Ontario and beyond. While Toronto's Action Plan presents a promising case of how municipalities can develop DEI interventions that are targeted, this study is limited to assessing the clarity, measurability, and transparency of the plan's design and reporting mechanisms. It does not evaluate implementation practices or examine outcomes and impacts experienced by Black communities. The limitations of this study present an opportunity for future research to explore not only what DEI plans promise but also what they actually deliver, along with their impacts and outcomes. Future studies may have the opportunity to assess the implementation and lived impact of municipal DEI plans through mixed-methods research, combining document analysis with qualitative approaches such as interviews, focus groups, or participatory evaluations.

Furthermore, given the findings of this study, Toronto emerges as a strong candidate for future research that seeks to address an unresolved question in the academic literature, not whether municipal DEI interventions are necessary, but how effective they are in practice. Longitudinal studies that track outcomes over time could shed light on whether policy commitments translate into structural change. Toronto's case could also be used to refine the methodological and evaluative tools used to study municipal equity work more broadly, offering insights into how effectiveness is defined, measured, and reported across the municipal sector and beyond.

Conclusion

This study examined the “Job Opportunities & Income Supports” section of the City of Toronto’s *Action Plan to Confront Anti-Black Racism* to assess how clearly it defines and measures progress in improving employment and economic opportunities for Black Torontonians. Through an evaluative content analysis, the study found that while the Action Plan reflects institutional commitment to racial equity, it lacked measurable indicators, consistent evaluation practices, and empirically verifiable data. These gaps align with critiques of DEI plans and practices in the literature, suggesting that these factors may hinder the ability to transition a plan from aspiration to sustained, transformative progress.

The presence of community partnerships, detailed reporting mechanisms like the Partnership and Accountability Circle, and the City’s commitment to developing a ten-year follow-up strategy reflect ongoing progress and a desire to build the infrastructure needed for more effective measurement. While the findings support critiques about the lack of standardization and verification in municipal DEI efforts, they should not be interpreted as a dismissal of the tangible gains made through the Action Plan. Rather, they emphasize the need to strengthen the foundations for future progress.

As municipalities continue to implement DEI plans in response to systemic inequities, this case study of Toronto provides key insights into the need and limits of current DEI plan development, implementation and evaluation practices. Institutionalizing accountability, investing in data systems, and designing community-driven evaluation tools will be critical for ensuring that DEI plans result in real, measurable, sustainable improvements in equity and inclusion at the community level.

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**Appendix A: Recommendations and Actions of the *Confronting Anti-Black Racism Plan's*
“Job Opportunities & Income Supports” Pillar**

Recommendation 11: Increase employment and training opportunities for Black Torontonians at the City of Toronto

Actions:

11.1 Outreach to, recruit and hire diverse Black people to increase the number and retention of employees of African descent at the City of Toronto

11.2 Engage diverse Black experts and community members to develop Anti-Black Racism training for all City staff and leaders with a focus in the areas of Human Resources practices, including recruitment, hiring, and retention

11.3 Include socio-demographics, including race and gender identity, as part of the City’s Count Yourself In employee survey

11.4 Enhance current City internship programs to include youth of African descent, including Black queer and trans youth

11.5 Engage Black City staff to create a Black Staff Network to support professional development and engagement

Recommendation 12: Provide mentorship programs as a pathway to employment and promotion for Black Torontonians

Actions:

12.1 Leverage federal and provincial funding to create career-based mentorship programs for Black youth to support skill development and the building of professional networks

Recommendation 13: Improve access to high-quality training and employment programs for Black youth

Actions:

13.1 Work with public and private sectors to create effective career pathways for Black youth by leveraging federal and provincial youth employment funding and addressing the specific needs of young women, young Francophones, youth who have been incarcerated, and queer and trans youth from Toronto's communities of African descent

13.2 Host employment fairs and skills development programs in community hubs and Black-focused agencies

13.3 Provide free police reference checks, training and certifications for Black youth to access volunteering and entry-level jobs

13.4 Target a City-administered youth employment program, funded by the federal and/or provincial governments, to support Black youth with criminal records and integrate funding for these youth to apply for record suspensions

13.5 Champion inclusive and equitable hiring practices among non-profit and private sector employers that focus the use of police reference checks, including vulnerable sector checks, only for circumstances where there is a legal obligation

13.6 Advocate to the provincial and federal governments to remove barriers to applying for criminal record suspensions

Recommendation 14: Improve job quality and income supports for precariously employed Black Torontonians

Actions:

14.1 Continue to advocate to the Ontario government to raise social assistance rates

Recommendation 15: Support Black-owned businesses to better compete and thrive in Toronto

Actions:

15.1 Target Black-owned businesses and social enterprises for outreach, training and vendor networking as part of the City of Toronto Social Procurement Program

15.2 Support the start-up and incubation of Black-owned businesses

15.3 Target development supports for businesses owned by Black women, Francophones, and people who were formerly incarcerated

Appendix B: Document Selection Criteria

Source: Documents were collected from two official City of Toronto platforms:

- The Confronting Anti-Black Racism webpage (<https://www.toronto.ca/community-people/get-involved/community/confronting-anti-black-racism/>)
- The City Council Minutes and Agendas search portal (<https://secure.toronto.ca/council/#/advancedSearch>)

Timeframe: Selection was limited to documents produced between 2017 and 2024.

Inclusion Criteria: Only documents that explicitly addressed the "Job Opportunities & Income Supports" pillar of the *Toronto Action Plan to Confront Anti-Black Racism* were included. These encompassed:

- Council reports
- Yearly work plans
- Appendix materials related to employment and economic initiatives
- Presentations
- Partnership and Accountability Circle (PAC) reports

Exclusion Criteria: Communication items such as:

- Public letters, media releases, and unrelated appendices
- Any document that did not mention employment, job training, or economic opportunity in the context of Black Torontonians was excluded from analysis.

Organization: Documents were organized by reporting year and submission batch, and were coded in NVivo by their source document (e.g., EC6.13, EX26.5, etc.).

The screenshot displays the NVivo software interface with a list of files and their coverage percentages. The interface includes a top menu bar with options like Home, Edit, Import, Create, Explore, Share, and Modules. A left sidebar contains navigation options such as IMPORT, Data, Files, and ORGANIZE. The main area shows a table with columns for File Name, In Folder, References, and Coverage.

File Name	In Folder	References	Coverage
Attachment E - 2017 Wo...	Files\Item - 2017.EX26.5	107	16.53%
Attachment B - 2018 Wo...	Files\Item - 2017.EX29.11	118	11.41%
(April 28, 2022) Present...	Files\Item - 2022.EC29.5	121	11.27%
Attachment C - interven...	Files\Item - 2017.EX26.5	309	11.19%
Appendix B - Year 4 Wo...	Files\Item - 2022.EC29.5	281	11.13%
Attachment B - Anti-Bl...	Files\Item - 2017.EX26.5	113	11.12%
Impact of CPPI Grants a...	Files\Item - 2017.CD22.6	73	11.09%
Appendix B - Year Five...	Files\Item - 2023.EC4.1	217	10.86%
Appendix D - Year Three...	Files\Item - 2020.EC17.3	119	10.43%
Attachment D - Provinc...	Files\Item - 2017.EX26.5	165	10.35%
Attachment C - ANTI-BL...	Files\Item - 2017.EX29.11	71	10.28%
(May 16, 2023) Report fr...	Files\Item - 2023.EC4.1	1369	9.42%
Appendix A - Year Three...	Files\Item - 2022.EC29.5	1303	9.40%
Appendix C - Partnersh...	Files\Item - 2023.EC4.1	833	9.23%
Appendix A - Year One...	Files\Item - 2019.EC6.13	490	9.02%
(April 12, 2022) Report f...	Files\Item - 2022.EC29.5	1182	8.97%
Appendix A - Year Four...	Files\Item - 2023.EC4.1	5421	8.68%
Appendix B - Year Two...	Files\Item - 2020.EC17.3	536	8.46%
Appendix A - Year Two...	Files\Item - 2020.EC17.3	926	8.35%
Appendix C - Year Two...	Files\Item - 2019.EC6.13	113	8.33%
Update on Toronto Actio...	Files\Item - 2019.EC6.13	739	8.30%
Presentation on Year Fo...	Files\Item - 2023.EC4.1	120	8.26%
Appendix B - Partnersh...	Files\Item - 2019.EC6.13	277	8.24%
The Interim Toronto Acti...	Files\Item - 2017.EX26.5	791	8.18%
Appendix D - Toronto Bl...	Files\Item - 2023.EC4.1	127	8.16%
Appendix C - Partnersh...	Files\Item - 2022.EC29.5	486	8.12%
The Toronto Action Plan...	Files\Item - 2017.EX26.5	787	7.89%
The Toronto Action Plan...	Files\Item - 2017.EX29.11	787	7.89%
Appendix D - Black-man...	Files\Item - 2022.EC29.5	147	7.75%
EC4.1 - Toronto Action P...	Files\Item - 2023.EC4.1	203	7.70%
Toronto Action Plan to C...	Files\Item - 2020.EC17.3	892	7.68%
(November 12, 2020) P...	Files\Item - 2020.EC17.3	63	7.50%
Appendix C - Confrontin...	Files\Item - 2020.EC17.3	289	7.32%
Agenda Item History - 2...	Files\Item - 2017.CD22.6	75	6.75%
Agenda Item History - 2...	Files\Item - 2017.EX26.5	156	6.67%
Agenda Item History - 2...	Files\Item - 2023.EC4.1	58	5.29%
Appendix A Impact of C...	Files\Item - 2017.CD22.6	131	5.04%
Agenda Item History - 2...	Files\Item - 2017.EX29.11	63	4.78%
Appendix E - Resource...	Files\Item - 2019.EC6.13	46	4.50%
Appendix B - Summary o...	Files\Item - 2017.CD22.6	46	4.28%
Agenda Item History - 2...	Files\Item - 2022.EC29.5	41	3.97%
Agenda Item History - 2...	Files\Item - 2020.EC17.3	27	3.82%
Agenda Item History - 2...	Files\Item - 2019.EC6.13	25	3.68%

Figure 1 Screenshot of NVivo File Organization

A total of 51 items were identified, of which 7 were main reports submitted to the Council.

Including these reports and their attachments, a total of 37 individual documents were selected, with one additional document being the PDF of the main Confronting Anti-Black Racism website, making it a total of 38 documents.

Appendix C: Full Document List

Report Title	Year	Committee/Body Submitted To	Authoring Division/Unit	Type of Document	Report Number
2017 Work Plan	2017	Executive Committee	Social Development, Finance and Administration	Attachment	EX26.5
Anti-Black Racism Lens	2017	Executive Committee	Social Development, Finance and Administration	Attachment	EX26.5
Intervention Strategies	2017	Executive Committee	Social Development, Finance and Administration	Attachment	EX26.5
Provincial Matters	2017	Executive Committee	Social Development, Finance and Administration	Attachment	EX26.5
Report from the Executive Director on the Interim Toronto Action Plan	2017	Executive Committee	Social Development, Finance and Administration	Report	EX26.5
The Toronto Action Plan to Confront Anti-Black Racism (Interim Plan)	2017	Executive Committee	Social Development, Finance and Administration	Attachment	EX26.5
2018 Work Plan	2017	Executive Committee	City Manager's Office	Attachment	EX29.11
Anti-Black Racism Partnership and Accountability Circle	2017	Executive Committee	City Manager's Office	Attachment	EX29.11
Report from the City Manager on the Toronto Action Plan	2017	Executive Committee	City Manager's Office	Report	EX29.11

Report Title	Year	Committee/Body Submitted To	Authoring Division/Unit	Type of Document	Report Number
The Toronto Action Plan to Confront Anti-Black Racism (Final Plan)	2017	Executive Committee	City Manager's Office	Attachment	EX29.11
Black Population Percentage, City of Toronto 2016	2019	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC6.13
Partnership and Accountability Circle Report on Year One	2019	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC6.13
Report on Update – Toronto Action Plan	2019	Economic & Community Development Committee	Social Development, Finance and Administration	Report	EC6.13
Resources List of Major Reports	2019	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC6.13
Year One Work Plan Summary	2019	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC6.13
Year Two Work Plan Priorities	2019	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC6.13
Confronting Anti-Black Racism (CABR) COVID-19 Response Summary	2020	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC17.3
Presentation on Year Two Update	2020	Economic & Community	Social Development,	Presentation	EC17.3

Report Title	Year	Committee/Body Submitted To	Authoring Division/Unit	Type of Document	Report Number
		Development Committee	Finance and Administration		
Year Two Update Report	2020	Economic & Community Development Committee	Social Development, Finance and Administration	Report	EC17.3
Year Three Work Plan Priorities	2020	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC17.3
Year Two Action Plan Summary	2020	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC17.3
Year Two PAC Report	2020	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC17.3
Black-Mandated Funding Framework Overview	2022	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC29.5
PAC Report	2022	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC29.5
Presentation – Council Report Year Three Update	2022	Economic & Community Development Committee	Social Development, Finance and Administration	Presentation	EC29.5
Year Three Update Report	2022	Economic & Community Development Committee	Social Development, Finance and Administration	Report	EC29.5

Report Title	Year	Committee/Body Submitted To	Authoring Division/Unit	Type of Document	Report Number
Year 4 Work Plan Priorities and Actions	2022	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC29.5
Year Three Action Plan Deliverables Progress Update	2022	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC29.5
Divisional Anti-Black Racism Action Plans (Part 1)	2023	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC4.1
Divisional Anti-Black Racism Action Plans (Part 2)	2023	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC4.1
PAC Report	2023	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC4.1
Presentation on Year Four Update	2023	Economic & Community Development Committee	Social Development, Finance and Administration	Presentation	EC4.1
Year Four Update Report	2023	Economic & Community Development Committee	Social Development, Finance and Administration	Report	EC4.1
Toronto Black Food Sovereignty Plan – Year One Highlights	2023	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC4.1

Report Title	Year	Committee/Body Submitted To	Authoring Division/Unit	Type of Document	Report Number
Year Five Work Plan Priorities and Deliverables	2023	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC4.1
Year Four Action Plan Summary of Progress	2023	Economic & Community Development Committee	Social Development, Finance and Administration	Appendix	EC4.1
The Toronto Action Plan to Confront Anti-Black Racism: An Overview	2023	Civic Resources Committee	Social Development, Finance and Administration	Presentation	CR1.7
Confronting Anti-Black Racism [Webpage]	n.d.	N/A	Social Development, Finance and Administration	Webpage	N/A

Table 1 List of Documents

Appendix D: Deductive Coding Framework

Code	Definition	Inclusion Criteria	Exclusion Criteria
Clear Indicators	Statements that include specific, measurable, and time-bound goals or outcomes.	Contains numbers, targets, or timelines tied to outcomes.	General aspirations without metrics.
Hiring Targets	Defined hiring goals, quotas, or targets related to Black Torontonians.	Mentions of % or number of Black hires, explicitly stated.	No numeric or measurable hiring goal.
Training/Skills Development	Mentions of training or skills development programs with quantifiable outcomes.	Specific references to the number trained, certifications issued, or completion outcomes.	No outcome specified or vague mentions of training.
Intersectionality in Employment	Statements that address barriers to employment for intersecting identities within Black communities (e.g., Black LGBTQ+, Francophone).	Mentions of Black subgroups (e.g., Black women, 2SLGBTQ+) in employment or training initiatives.	No mention of intersecting identities or subgroups.
Pilot or Prototype Programs	Mentions of initiatives that are pilots, prototypes, or early-stage programs.	Trial projects, pilots, or programs with a plan for review or scaling.	Fully implemented or ongoing mainstream programs.
Implementation Responsibility	Mentions of which division, department, or agency is responsible for implementation.	Division, department, or role explicitly mentioned as lead or contributor.	No responsibility assigned.
Unclear or Vague Language	Aspirational or general statements lacking specificity, metrics, or timelines.	Statements with no indicators, targets, or measurement tools.	Includes indicators or timelines.
Tracking Mechanisms	Processes or systems mentioned to track and monitor progress or performance.	Mentions of monitoring, tracking, evaluation, or performance systems.	Mentions goals but not tracking systems.
Annual Work Plans	Mentions of using or producing annual work plans to guide implementation.	Use of annual planning or review cycles.	No reference to plan cycles or implementation steps.

Code	Definition	Inclusion Criteria	Exclusion Criteria
Progress Indicators	References to indicators used to measure performance or program effectiveness.	Mentions of KPIs, benchmarks, or other measures of impact.	No quantifiable indicators or vague language only.
Public Reporting	Evidence of sharing progress publicly through reports, dashboards, or presentations.	Evidence of summaries, dashboards, or council/public reports.	Internal use or documents not made public.
Disaggregated Data Collection	Mentions of data collection disaggregated by race, gender, etc., for tracking equity impacts.	Race-based or gender-based data collection and usage.	General data collection without race/gender breakdown.
Transparency Gaps	References to missing or incomplete data, lack of reporting, or accountability structures.	Statements identifying lack of clarity, missing data, or low transparency.	Detailed reporting present.
Data Transparency	Information on whether data is visible, accessible, and clearly presented.	Mentions of clear reporting, open data, or published metrics.	General reference to data without clarity.
Clear Methodologies	Descriptions of how data is collected, analyzed, or interpreted, including transparency of process.	Statements that describe data procedures and tools clearly.	Vague references to evaluation without methods.
Outcome Metrics	Mentions of specific indicators, benchmarks, or quantitative goals linked to employment outcomes.	Mentions of % increase in employment, job placements, or skill certifications.	Mentions goals but no quantification.
External Validation	Ability to cross-reference with other data sources (e.g., Statistics Canada, third-party evaluation).	Use of third-party or comparable external data sources.	No link to external data sources.
Limitations	Acknowledgment of limitations in data collection, tracking, or access.	Mentions of data or evaluation gaps, untracked items.	Clear, complete data is available.
No Verification Tools	Mentions of the absence of tools or methods to validate, audit, or verify reported data.	Mentions of the absence of tools, platforms, or methods to verify data.	Data can be independently verified.

Table 2 Sample of Deductive Codes Derived from Null Hypotheses

The screenshot displays the NVivo software interface with a list of codes and subcodes. The interface includes a top menu bar with options like Home, Edit, Import, Create, Explore, Share, and Modules. A left sidebar contains navigation options such as Data, Files, Cases, Notes, Sets, Queries, and Visualizations. The main area shows a table with the following columns: Name, Files, References, Created on, Created, Modified on, Modified by, and Color. The table lists various codes and subcodes, such as 'ABR definition', 'action or goal stated', 'Addressing specific issu...', 'Collaboration with comm...', 'Collaborative developme...', 'Development of Partners...', 'Expert Working Groups', 'Identification of related c...', 'Inclusive and accessible...', 'Intergovernmental Advoc...', 'Internal implementation...', 'Intervention to improve c...', 'Investment in Black com...', 'Investment in Black youth', 'Policy development with...', 'Recruitment, hiring, pro...', 'Reporting', 'Sharing Interim Plan', 'Aspirational Commitments', 'Black Youth Initiatives', 'city responsibility', 'Clear Indicators', 'data requested or provided', 'deliverable provided', 'Integration with Existing...', 'Requirement of Anti-Blac...', 'Employment & Economic In...', 'Employment and Economic...', 'Funding provided', '2018 Budget Request for...', 'Allocations and Agreeem...', 'Black Youth Internship In...', 'Community-Led Initiative...', 'Honorarium and Accessi...', 'Impact of CPIP Grants R...', 'HO2_Nodes_For_NVivo', 'Hiring Targets', 'Impact reports', 'Implementation Responsibil...', 'Intersectionality in Employ...', and 'Lack of Metrics'. Each row includes a radio button in the 'Name' column, a count in the 'Files' column, a count in the 'References' column, a date and time in the 'Created on' column, a date and time in the 'Created' column, a date and time in the 'Modified on' column, a name in the 'Modified by' column, and a color indicator in the 'Color' column.

Name	Files	References	Created on	Created	Modified on	Modified by	Color
<input type="radio"/> ABR definition	2	5	2025-04-12, 2:58...	ZF	2025-04-12, 3:46...	ZF	
<input type="radio"/> action or goal stated	2	6	2025-04-12, 3:29...	ZF	2025-04-12, 3:41P...	ZF	
<input type="radio"/> Addressing specific issu...	1	1	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Collaboration with comm...	1	1	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Collaborative developme...	1	1	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Development of Partners...	0	0	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	AI	
<input type="radio"/> Expert Working Groups	1	2	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Identification of related c...	1	1	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Inclusive and accessible...	1	1	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Intergovernmental Advoc...	1	1	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Internal implementation...	1	1	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Intervention to improve c...	1	2	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Investment in Black com...	1	2	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Investment in Black youth	1	1	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Policy development with...	1	2	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Recruitment, hiring, pro...	1	1	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Reporting	1	2	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Sharing Interim Plan	1	1	2025-04-12, 3:48...	AI	2025-04-12, 3:48...	ZF	
<input type="radio"/> Aspirational Commitments	1	1	2025-04-06, 7:26...	AI	2025-04-12, 3:18P...	ZF	
<input type="radio"/> Black Youth Initiatives	2	5	2025-04-06, 7:26...	AI	2025-04-12, 3:41P...	ZF	
<input type="radio"/> city responsibility	2	5	2025-04-12, 3:08...	ZF	2025-04-12, 3:35...	ZF	
<input type="radio"/> Clear Indicators	2	4	2025-04-06, 7:26...	AI	2025-04-12, 3:23...	ZF	
<input type="radio"/> data requested or provided	2	2	2025-04-12, 3:21PM	ZF	2025-04-12, 3:42...	ZF	
<input type="radio"/> deliverable provided	1	1	2025-04-12, 3:33...	ZF	2025-04-12, 3:33...	ZF	
<input type="radio"/> Integration with Existing...	1	1	2025-04-13, 9:56...	AI	2025-04-13, 9:56...	ZF	
<input type="radio"/> Requirement of Anti-Blac...	1	3	2025-04-13, 9:56...	AI	2025-04-13, 9:56...	ZF	
<input type="radio"/> Employment & Economic In...	1	3	2025-04-06, 7:26...	AI	2025-04-12, 1:09P...	ZF	
<input type="radio"/> Employment and Economic...	1	3	2025-04-06, 7:14...	ZF	2025-04-12, 1:09P...	ZF	
<input type="radio"/> Funding provided	6	8	2025-04-12, 2:51PM	ZF	2025-04-12, 3:23...	ZF	
<input type="radio"/> 2018 Budget Request for...	1	2	2025-04-12, 3:47...	AI	2025-04-12, 3:47...	ZF	
<input type="radio"/> Allocations and Agreeem...	1	1	2025-04-12, 3:47...	AI	2025-04-12, 3:47...	ZF	
<input type="radio"/> Black Youth Internship In...	1	1	2025-04-12, 3:47...	AI	2025-04-12, 3:47...	ZF	
<input type="radio"/> Community-Led Initiative...	1	1	2025-04-12, 3:47...	AI	2025-04-12, 3:47...	ZF	
<input type="radio"/> Honorarium and Accessi...	1	1	2025-04-12, 3:47...	AI	2025-04-12, 3:47...	ZF	
<input type="radio"/> Impact of CPIP Grants R...	1	4	2025-04-12, 3:47...	AI	2025-04-12, 3:47...	ZF	
<input type="radio"/> HO2_Nodes_For_NVivo	0	0	2025-04-12, 12:26...	ZF	2025-04-12, 12:26...	ZF	
<input type="radio"/> Hiring Targets	1	3	2025-04-06, 7:26...	AI	2025-04-12, 1:09P...	ZF	
<input type="radio"/> Impact reports	1	1	2025-04-12, 2:52...	ZF	2025-04-12, 2:53...	ZF	
<input type="radio"/> Implementation Responsibil...	3	3	2025-04-06, 7:26...	AI	2025-04-12, 3:30...	ZF	
<input type="radio"/> Intersectionality in Employ...	1	1	2025-04-06, 7:26...	AI	2025-04-12, 3:43...	ZF	
<input type="radio"/> Lack of Metrics	2	2	2025-04-06, 7:26...	AI	2025-04-12, 3:18P...	ZF	

Figure 2 Screenshot of NVivo Codes and Subcodes

Appendix E: Sample of Coded Text

Interim Toronto Action Plan to Confront Anti-Black Racism (EX26.5)

Subcode	Document	Page	Quote
Plan Scope & Structure	Interim Toronto Action Plan (Report)	1	“The Action Plan includes 22 recommendations and 80 actions to address five issue areas: children and youth development; health and community services; job and income supports; policing and the justice system; and community engagement and Black leadership.”
Targeted Universalism Approach	Interim Toronto Action Plan (Report)	12	“Whenever governments and service providers work to target the removal of systemic barriers experienced by the most disadvantaged communities, all residents benefit. The Interim Toronto Action Plan... follows this approach of targeted universalism. The actions, when taken as a whole and executed fully, will benefit all Torontonians, especially other Toronto communities experiencing racism and marginalization.”
Intersectionality Acknowledged	Attachment B: Anti-Black Racism Lens	1	“This combined experience of marginalization is known as intersectionality. Intersectionality indicates, for example, that Black women and Black transgender people face anti-Black racism uniquely at the intersections of overlapping systems of discrimination based on race and on gender. An understanding of intersectionality is mandatory in using an Anti-Black Racism Lens to properly account for and respond to the needs of diverse Black Torontonians.”
Equity Lens Integration	Interim Toronto Action Plan (Report)	3	“To be effective, the final Toronto Action Plan requires the use of an Anti-Black Racism Lens towards the full implementation of all 22 recommendations and 80 actions, with specific mention in 11 actions. Appendix B provides detail on the Anti-Black Racism Lens and the 11 specific municipal actions requiring the Lens.”
Plan Organization (Intervention Strategies)	Interim Toronto Action Plan (Report)	10	“The 80 actions of the Interim Toronto Action Plan are summarized into nine Intervention Strategies... meant to intentionally interrupt anti-Black bias and

Subcode	Document	Page	Quote
			discrimination... in order to improve conditions and opportunities for Black Torontonians, and by extension, benefit all Torontonians. The nine Intervention Strategies are summarized in Table 1 with the corresponding number of actions for each strategy.”
Example Action – Specific	Attachment C: Intervention Strategies	1	“Develop and implement training on effective programming for Black children and youth, through an Anti-Black Racism Lens”
Example Action – Lacks Measurable Target	Attachment C: Intervention Strategies	1	“Increase hiring of Black Torontonians and partnerships with diverse Black communities to ensure that children and youth programs reflect the diversity of the communities they serve”
Immediate Actions (2017 Quick Wins)	Interim Toronto Action Plan (Report)	12	“The 2017 work plan includes 7 concrete actions that the City can take in 2017. These actions can be achieved within existing resources. It also highlights a need to finalize the Toronto Action Plan with key implementation details – work plans, a partnership model, and cost implications.”
Annual Work Plans & Public Reporting	Toronto Action Plan (Council Report)	12	“For each year of implementation, an annual work plan will be created by City staff, in collaboration with community members and submitted to City Council for approval. Each annual work plan will contain key priorities and initiatives... Work plans also include a mix of initiatives that can be completed within existing resources and others requiring new investments. An annual progress report for each implementation year will be reported publicly to help ensure continued improvement and community accountability.”
Integration with Budget Process	Interim Toronto Action Plan (Report)	2	“Annual work plans will include a mix of initiatives that can be completed within existing resources and initiatives that may require additional funding... Should additional funding be required to deliver the 2018 Work Plan, the funding requirements will be considered as part of the 2018 budget review process.

Subcode	Document	Page	Quote
			As well, funding requirements for the 2019 and future-year Work Plans will be considered as part of the City's annual budget review processes."
Implementation Governance – Working Groups	Agenda Item History – 2017.EX26.5	1	"Requested the Executive Director, Social Development, Finance and Administration to work with relevant Division Heads to convene five Expert Working Groups to: a. develop focused multi-year work plans for the following five Intervention Strategies: (1) Staff Training; (2) Staff Recruitment; (3) Race-based Data; (4) Youth Mentorship and Employment; and (5) Public Education... b. identify corresponding resource implications for the plans;"
Implementation Governance – Partnership Table	Agenda Item History – 2017.EX26.5	1	"c. develop a model for an effective Partnership Table to oversee the implementation of the Toronto Action Plan to Confront Anti-Black Racism; d. consist of relevant City division and agency staff and Black community leaders with expertise in the specific area of intervention;"
Ongoing Advisory Mechanism	Agenda Item History – 2017.EX26.5	1	"Directed the City Manager and the Executive Director... to report on the possibility of working with the African Canadian community to establish a diverse, representative City Council advisory body, the African Canadian Affairs Oversight and Collaboration Committee, to advise City Council and promote on-going engagement with the African Canadian community."
Evidence Base (Research & Engagement)	Interim Toronto Action Plan (Report)	1	"Phase two was the review of 41 years' worth of research and recommendations about addressing anti-Black racism in Toronto. This review created the foundation for 41 Community Conversations in phase three to determine how best to take meaningful action going forward. Conversations ran from January to March 2017. Black Torontonians reviewed a draft

Subcode	Document	Page	Quote
			action plan at a citywide workshop in May 2017 and provided feedback.”
Race-Based Data Collection & Transparency	Attachment C: Intervention Strategies	1	“6.3 Coordinate with funders to require the collection and public reporting of health and community service data disaggregated by race and other characteristics”
Race-Based Data – Mandatory Reporting	Attachment C: Intervention Strategies	1	“17.1 Collect and publicly report mandatory race-based data for greater transparency.”
Ongoing Evaluation (Audit)	Attachment C: Intervention Strategies	3	“Conduct an audit using an Anti-Black Racism Lens to evaluate City spaces and programs” (Attachment C - Intervention Strategies.pdf)
Initiating Data Strategy	Attachment E: 2017 Work Plan	1	“Advance a Disaggregated Data Strategy for the City of Toronto including race-based data”

Table 3 Interim Toronto Action Plan to Confront Anti-Black Racism (EX26.5) and Attachments

Toronto Action Plan to Confront Anti-Black Racism – Year Four Update (EC4.1)

Subcode	Document	Page	Quote
Employment Program Output	Year Four Update Report (SDFA, May 16, 2023)	p.5	“Investment to develop effective intergenerational programming for Black children and deliver targeted programming for Black queer and trans youth, including training 2,329 new recreation workers to implement relevant programming. Funds will also support the hiring of Black youth through employment programs”.
Mentorship Outcome	Year Four Update Report (SDFA, May 16, 2023)	p.14	“\$100,000 invested in the Toronto History Museums Awakenings Artist Mentorship Program... 60 percent of mentees who participated are Black”.
Business Training Output	Year Four Update Report (SDFA, May 16, 2023)	p.14	“\$21,000 invested in research... to better engage and support Black-owned businesses... 3 “Supplier Readiness” training workshops were... delivered to 3 cohorts of 25 B3 business leaders. 2 tailored “Doing Business with the City” training sessions were conducted for Black-centered councils and chambers”.
Job Training Participants	Year Four Update Report (SDFA, May 16, 2023)	p.14	“\$900,000 invested to support 140 BIPOC participants to complete training through various programs... including the Production Assistant Skills Development Program for Black Youth”.
Black Staff Retention Effort	Year Four Update Report (SDFA, May 16, 2023)	p.19	“Toronto Employment and Social Services’ divisional Black Staff Network has... grown with 112 Black staff members and aims to retain Black workers through various professional development, coaching, and mentorship opportunities”
Progress Tracking	Year Four Update Report (SDFA, May 16, 2023)	p.13	“Overall, 80 percent of all Action Plan recommendations have been implemented. 48 percent of Year Four’s work plan activities are complete. The remaining 52 percent are multi-year actions...”

Subcode	Document	Page	Quote
Systematic Tracking	Year Four Update Report (S DFA, May 16, 2023)	p.13	“The Year Four Work Plan identifies 41 actions... 48 percent of Year Four’s work plan activities are complete... categorized and tracked Year Four Work Plan activities across six themes... Table 3 provides a snapshot of progress by theme”
Divisional Plans	Year Four Update – Attachments Summary (City Clerk Agenda)	–	“A compilation of divisional-led Anti-Black Racism Action Plans that demonstrate how City staff are embedding culture change in their mandate and operations”
Public Reporting Requirement	Appendix B – Year Five Work Plan Priorities (2023)	p.2	“Coordinate with funders to require the collection and public reporting of health and community service data disaggregated by race and other characteristics”.
Action Progress Tracking	Appendix D – Black Food Sovereignty Plan Highlights (2022)	Year 1	“In year one, 22 of the 45 City Council approved actions were advanced... 48% of all actions started”.
Qualitative Outcome Indicator	Appendix A – Year Four Progress Summary (2022)	p.62	“At the end of 2022, the TTC had ~68 community partners... Implement a talent acquisition system... An increase in skilled applicants to TTC jobs. Public awareness about job opportunities... In progress”
Outcome Analysis Needed	Agenda Item History – 2023.EC4.1 (City Council Decision)	–	“City Council direct the Executive Director... to review and analyze the impact and outcomes in the first five years of the Action Plan and develop a new 10-year plan... and report back in Q4 2024”
Data Clarity Issue	Year Four Update Report (S DFA, May 16, 2023)	p.19	“This work includes procurement for Black-owned business... for events, forums, and trainings... In 2022, the division hosted several events and pilots with over 5 Black-owned businesses and community organizations”
Race-based Data Evidence	Appendix C – PAC Year 4 Report (2023)	p.3	“Race-based disaggregated data collection is being done in select city divisions and agencies and is validating concerns voiced by Toronto’s Black communities for decades. Most notably, race-based

Subcode	Document	Page	Quote
			data proved that TPS continues to disproportionately use force... against Black communities”
Baseline Data Transparency	Appendix D – Black Food Sovereignty Plan Highlights (2022)	Year 1	“28.4% of Black households are food insecure”
Data Governance & Accountability	Appendix B – Year Five Work Plan Priorities (2023)	p.1	“Year Five will prioritize the development of community-informed best practice models to... inform the collection of internal and external disaggregated race-based data. These models will... increase accountability in data collection and governance to inform responsive strategies... to reduce inequities”.
Economic Opportunity Focus	Appendix D – Black Food Sovereignty Plan Highlights (2022)	Year 1	“Collaborations have been established with Black-led organizations... working to improve access to culturally relevant food and economic opportunities that serve Black youth, continental African residents, and Afro-Indigenous and 2SLGBTQ+ populations”

Table 4 Toronto Action Plan to Confront Anti-Black Racism – Year Four Update (EC4.1) and Attachments

Appendix F: Summary of Clarity, Measurability, and Verifiability Across City of Toronto Action Plan Documents (2017–2023)

Cells of the table filled with **green** indicate evidence is present, while **orange** shows that none were found.

Year	Document(s)	Indicator Present?	Measurable Outcome?	Tracking Publicly Reported?	Verifiable Data Source?
2017	City of Toronto (2017e, 2017f) – Interim Plan & Attachment A	No indicators for employment equity or job training	No outcome metrics or targets	No reporting framework specified	No datasets or methods cited
2018	City of Toronto (2019e) – Year One Work Plan Summary	Status labels and activity outputs (e.g., youth job fairs, internships)	No outcome definitions (e.g., employment placement, income impact)	Implementation status publicly listed (e.g., "complete")	No source data, baselines, or verification methods
2019	City of Toronto (2019f, 2019c) – Appendix C & Update Report	Language is aspirational; no metrics tied to employment outcomes	No benchmarks, indicators, or methods	Narrative-style reporting; no structured tracking	No source references, raw data, or methodologies
2020	City of Toronto (2020e, 2020f, 2020c) – Year Two Summary, PAC Report, Update Report	Quantitative outputs (e.g., 1,012 trained; 82% accessed opportunities)	No explanation of metrics or how “success” was measured	Summary of number of trained staff, sessions delivered	No explanation of sampling, methodology, or validation
2022	City of Toronto (2022e, 2022f, 2022b) – Year Four Summary, Work Plan, PAC Report	Thematic progress (e.g., 48% complete), training and mentorship investments	Still lacks outcome benchmarks (e.g., retention, job access rates)	Activities categorized by division/theme; PAC engaged in review	Some references to public health data, but not tied to employment equity

2023	City of Toronto (2023e, 2023h, 2023g, 2023f, 2023c, 2023a, 2023b, 2023d) – EC4.1 Report, Appendices A–E, Presentation	Action completion rates (e.g., 48%), investments (\$1.8M), participation levels (e.g., 2,329 workers trained)	No measurement of job placement, income impact, or equity outcomes	Status tracking by division and theme; Year Five plan includes formal evaluation commitment	Some references to public data (e.g., Public Health, Toronto Police), but no formal audit methods
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Table 5 Summary of Clarity, Measurability, and Verifiability Across City of Toronto Action Plan Documents (2017–2023)

Appendix G: Key Terms and Definitions

Definitions are taken verbatim or adapted from cited sources.

Anti-Black Racism

Prejudice, attitudes, beliefs, stereotyping and discrimination directed at people of African descent, rooted in their unique history and legacy of enslavement. It is entrenched in Canadian institutions, policies, and practices and manifests in social, economic, and political marginalization (Government of Ontario, 2018).

Baseline Data

Initial data collected before a program begins, used as a reference point to measure change or progress over time (Government of Ontario, 2018).

Black/African Torontonians/Canadians

People of African descent and those who define themselves as such (Canadian Race Relations Foundation, n.d.).

Critical Race Theory (CRT)

The core idea is that race is a social construct and that racism is embedded in legal systems and structures, not merely the result of individual bias. CRT centers the voices and lived experiences of people of colour and interrogates systemic inequities (National Defence, 2023).

Demographic Representation

The degree to which a population or workforce proportionally reflects the demographic characteristics (e.g., race, gender, disability) of the broader population.

Disaggregated Data

Data that is broken down into smaller sub-categories (e.g., by race, gender, age) to allow more detailed analysis of patterns and disparities (Government of Ontario, 2018).

Disparities

Measurable differences in outcomes between groups, such as income, education, health, or employment, that reflect systemic barriers (Government of Ontario, 2018).

Disproportionality

Over- or under-representation of a group in a system or outcome relative to their presence in the general population (Government of Ontario, 2018).

Employment Equity

A legal and policy framework aimed at increasing representation and fairness in employment practices for designated groups: women, Indigenous Peoples, racialized groups, and persons with disabilities (Government of Canada, 2025).

Employment Rate

The percentage of the working-age population that is employed (Government of Canada, 2024).

Equity-Denied Groups

Groups that, due to systemic discrimination, face barriers to accessing resources, services, and opportunities required for equitable outcomes (Government of Canada, 2025).

Gender-Based Analysis Plus (GBA+)

An analytical tool used to assess how diverse identity factors intersect to influence how people experience policies, programs, and initiatives (Government of Canada, 2025).

Income Disparities

Differences in earnings between social groups that reflect structural inequities in access to opportunity.

Income Security

The stability, adequacy, and predictability of an individual's or household's income to meet basic needs.

Intersectionality

A theoretical framework recognizing that people's experiences are shaped by overlapping social identities (e.g., race, gender, disability, class), which together produce unique forms of privilege or oppression (Government of Ontario, 2018).

Impact

The long-term, systemic change that results, directly or indirectly, from a program, policy, or intervention. Impact refers to sustained shifts in structures, conditions, or institutions that affect population-level outcomes, such as reductions in racial disparities or improvements in social equity. Impacts are often influenced by multiple factors and extend beyond immediate or measurable outcomes (Mertens & Wilson, 2019, pp. 227-233).

Marginalization

A long-term structural process in which certain groups are pushed to the periphery of society and denied full access to its resources and opportunities (Government of Ontario, 2018).

Outcome

A short- to medium-term change that occurs as a result of a program or intervention (e.g., improved employment access or reduced systemic barriers) (Mertens & Wilson, 2019).

Output

The immediate, countable results of a program activity (e.g., number of people trained, number of events delivered). Outputs are not the same as outcomes (Mertens & Wilson, 2019).

Pay Equity

The principle of equal pay for work of equal value, such as ensuring that men and women receive equal pay for comparable work (Ontario Human Rights Commission, n.d.).

Postpositivist Paradigm

A philosophical stance asserting that the social world can be studied objectively and causally, often using quantitative methods and value-free approaches (Mertens & Wilson, 2019).

Pragmatic Paradigm

A philosophy emphasizing practical consequences and stakeholder relevance, favouring mixed methods and adaptable designs based on evaluation questions (Mertens & Wilson, 2019).

Precarious Employment

Work that is insecure, unstable, low-paid, or lacks protections such as benefits, unionization, or legal entitlements. It disproportionately affects marginalized groups (Government of Canada, Canadian Centre for Occupational Health and Safety, 2024).

Public Administration

The field and practice of implementing government policies and services. It includes policy development, regulation, service delivery, and the stewardship of public resources (Bovaird & Loeffler, 2024).

Racial Equity

The systemic fair treatment of all racial groups, resulting in equitable opportunities and outcomes. It is both a process and an outcome (Government of Ontario, 2018).

Racial Inequality

Unequal treatment or outcomes experienced by racial groups due to systemic discrimination (Government of Ontario, 2018).

SMART Goals

A goal-setting framework where objectives are Specific, Measurable, Achievable, Relevant, and Time-bound.

Social Equity

The just and fair distribution of public resources, services, and opportunities, with attention to historical and structural disadvantage.

Social Resources

The institutions, networks, services, and supports, such as education, healthcare, housing, and social connections, that individuals and communities rely on to meet their needs and pursue well-being. Access is shaped by systems of power and inequality (Lin, 2001).

Structural Racism

A form of systemic racism embedded across society's institutions, policies, and norms that maintains racial hierarchies over time (Government of Ontario, 2018).

Systemic Racism

Organizational practices and policies, often appearing neutral on the surface, can create or reinforce racial inequities in access to opportunities, benefits, or services (Government of Ontario, 2018).

Underemployment

A condition where individuals work in jobs that do not match their skills, education, or experience, or where they work part-time involuntarily while seeking full-time work (Government of Canada, 2023).