

Honourable Tony Clement, President of the Treasury Board
Treasury Board of Canada
President's Office
140 O'Connor Street
Ottawa, ON K1A 0R5

April 19, 2012

Dear Minister Clement:

The Canadian Mental Health Association, Ontario (CMHA Ontario) is a non-profit provincial organization committed to promoting mental health and improving services and supports for individuals living with mental health conditions.

CMHA Ontario supports and would like to provide our advice regarding the Government of Canada's Open Government Initiative (OGI). In overview, we support increasing the collection of and access to data about marginalized populations, and the engagement of marginalized populations in OGI activity.

Access to Data regarding Marginalized Populations in Canada

The goal of the Open Data component of the Open Government Initiative is to make government data available to citizens, the private sector and NGOs. We have two primary concerns related to this OGI stream: the elimination of government questionnaires about marginalized populations; and historical and ongoing gaps in data collected about marginalized populations.

CMHA Ontario is concerned about the recent elimination of key Statistics Canada questionnaires including the Participation and Activity Limitation Survey (PALS), the Longitudinal Survey of Immigrants to Canada (LSIC), the mandatory long-form census and other instruments. These questionnaires produced invaluable information regarding marginalized populations in Canada and contributed greatly to research, planning and policy development.

Elimination of important data resources such as these lessen our capacity in Canada to assess relationships between key demographic factors, such as income, language, disability, and racialization, and to monitor changes in population factors over time.

Other demographic data has not been collected consistently, or never been collected at all. This includes health status information such as prevalence and experience of mental health conditions, and demographic factors like sexual orientation and gender identity. This greatly impedes planning of services.

Engagement of Marginalized Communities

CMHA Ontario would like to see greater engagement of marginalized populations in all three OGI streams, particularly the Open Dialogue stream. This engagement would include considerations of accessibility, engagement and representation of marginalized populations at all stages and activities of the OGI.

The goal of the OGI's Open Dialogue stream is to give Canadians a stronger say in government policies and priorities, supported through engagement through Web 2.0 technologies. CMHA Ontario is concerned that a strategy focused on social media may exclude participation from many marginalized populations due to access barriers.

Marginalized populations face a range of barriers in accessing computer and internet technology. Internet access is unreliable or unavailable in some rural, remote or northern communities across Canada. Low-income individuals or families in all parts of the country, including major urban centres, face financial barriers to accessing computers and the internet. In addition, many individuals may experience language or computer literacy barriers that impede participation in social media initiatives.

People with disabilities face not only the above barriers, but additional barriers related to the accessibility of websites or other forms of technology from an information and communications standpoint.

Although the OGI currently includes opportunities for stakeholder engagement, including the Advisory Panel, there are no clear avenues to engage representatives of marginalized populations throughout the process. Given the concerns raised above, it is important to ensure that the perspectives and realities of marginalized populations are represented at all stages of OGI activity, and particularly in decision-making.

Recommendations

CMHA Ontario recommends that the Government of Canada:

- 1) Reinstate questionnaires that track information about marginalized populations including the mandatory long-form census questionnaire, PALS, and LSIC.
- 2) Work with stakeholders, including representatives from marginalized populations, to develop processes for meaningful and effective collection of data about marginalized populations including: people with disabilities; Aboriginal people; low-income groups; ethno-racial groups; lesbian, gay, bisexual and trans (LGBT) individuals and other groups.
- 3) Work with stakeholders, including representatives of marginalized populations, to develop strategies to engage marginalized populations in all dimensions of the OGI, especially the Open Dialogue stream.
- 4) Ensure that marginalized populations are represented in OGI decision-making processes.
- 5) Ensure that accessibility for people with disabilities is considered in all OGI activity.
- 6) Ensure that all OGI website and social media activities are accessible to people with disabilities from an information and communications standpoint by adopting accessibility guidelines, such as those set out in the [Information and Communications section](#) of the *Integrated Accessibility Standards* under the *Accessibility for Ontarians with Disabilities Act, 2005*

We encourage the government to consider these recommendations. For more information, please contact Sheela Subramanian, Planning and Policy Analyst at ssubramanian@ontario.cmha.ca or (416) 977-5580 x4157.

Yours very truly,

A handwritten signature in black ink, appearing to read "Lorne Zon". The signature is written in a cursive, flowing style with a large initial "L" and a long, sweeping tail.

Lorne Zon, Chief Executive Officer