June 2, 2016

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act [Our file #: WP/5/2016]

On May 19, 2016, the Women's Policy Office received your request for access to the following records:

Copies of all or any gender analysis tools used by the Women's Policy Office for analyzing government policy, legislation and budgetary actions.

I am pleased to inform you that a decision has been made by the Deputy Minister for the Women's Policy Office to provide access to the requested information.

In accordance with your request for a copy of the records, the appropriate copies have been enclosed.

The Access to Information and Protection of Privacy Act (the Act) requires us to provide an advisory response within 10 days of receiving the request. As this request has been completed prior to day 10, this letter also serves as our Advisory Response.

Please be advised that you may ask the Information and Privacy Commissioner to review the processing of your access request, as set out in section 42 of the Act. A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner.

The address and contact information of the Information and Privacy Commissioner is as follows:

Office of the Information and Privacy Commissioner
2 Canada Drive
P. O. Box 13004, Stn. A
St. John's, NL. A1B 3V8

P.O. Box B700, St. John's, NL, Canada A1B 4J6 t 709.729.5098 f 709.729.2331
You may also appeal directly to the Supreme Court Trial Division within 15 business days after you receive the decision of the public body, pursuant to section 52 of the Act.

Please be advised that responsive records will be published following a 72 hour period after the response is sent electronically to you or five business days in the case where records are mailed to you. It is the goal to have the responsive records posted to the Office of Public Engagement’s website within one business day following the applicable period of time. Please note that requests for personal information will not be posted online.

If you have any further questions, please contact me by telephone at 729-2987 or by email at leannelane@gov.nl.ca.

Sincerely,

Leanne Lane
ATIPP Coordinator

Enc.
GBA+ Checklist

✓ Identify the issue. How are both women and men's experiences reflected in the way issues are identified?

✓ Consider critical factors that influence the issue — sex, gender, age, sexual orientation, race, ethnicity, ability and socio-economic status.

✓ Determine differential outcomes based on gender and/or socio-economic status and try to mitigate these where possible.

✓ Consider the implications of policy options and include gender as a key element. Identify any possible or unintended outcomes.

✓ Identify what information is required to ensure all perspectives are included. For example, consider input from community groups and other stakeholders.

✓ Design research to collect disaggregated data using both qualitative and quantitative research.

✓ A communication plan is essential to the success of a policy or program so be sure to include outreach to women, men and diverse groups.

✓ Consider who needs to review research reports and how recommendations will be used to develop more equitable policy.
an integrated approach to policy/program development

guidelines for gender inclusive analysis

women's policy office
an integrated approach to policy/program development

guidelines for gender inclusive analysis

Published By:
The Women’s Policy Office
Government of Newfoundland & Labrador
Confederation Building
4th Floor, West Block
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St. John’s NL A1B 4J6
The development of this guide has involved consultation with provincial and national groups and government representatives regarding their experiences in working to create and promote gender sensitive tools for research and analysis. The content draws from other guides that have been produced by governments in other parts of Canada and in New Zealand (Ministry of Women's Affairs). It made sense to build on the rich offerings of their materials. Specifically we want to credit the provincial governments of British Columbia, Nova Scotia, New Brunswick, and the federal departments of Status of Women Canada, Human Resources Development Canada, and the Canadian International Development Agency. Other materials are referenced at the end of the guide.

A special thanks goes to the researcher and writer of the guide, Cheryl Hebert. As well, we appreciate the work of the Advisory Committee in providing guidance and support throughout the research. Committee members included: Dorothy Robbins, Jennifer Jeans, Carla Woodworth-Lynas, Beth Lacey, and Joyce Hancock.

Researched and Written by Cheryl Hebert

Design and Layout: Beth Oberholtzer


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The Women's Policy Office, which was established in 1985, works with other government departments to ensure that government policies and programs reflect the interests and experiences of women. As a central agency, the Office forms an essential link between women's interests and government decision makers. It is located within Executive Council, and the staff reports to the Minister Responsible for the Status of Women. The Office acts as a Secretariat to the Minister who represents women's interests in all policy debates. Women's Policy Office staff consult on an on-going basis with women's groups and organizations to ensure that their views are considered in policy and program development.

The Office supports departments, agencies and boards in conducting gender inclusive analysis on legislation, policies and programs and can provide assistance through training, advice and access to information. Office staff will monitor and evaluate the effectiveness of this guide in meeting the proposed objectives.
This guide is developed as a "hands-on" document to assist in the implementation of gender-inclusive analysis in all government departments. The publication is designed in two parts. Section one: Learning About Gender Inclusive Analysis describes the definition, purpose, and benefits of gender inclusive analysis. Section two: Applying Gender-Inclusive Analysis to the Policy/Program Development Process presents a method for applying gender inclusive analysis in policy and program analysis and development.

Although it is expected that you will use this guide to incorporate gender inclusive analysis in your policy and program work, staff at the Women's Policy Office is available to help you implement this approach. We will work with you to understand the dimensions of gender inclusive analysis and its application within your department.

The Women's Policy Office has developed a four module training workshop to accompany this guide. You can access additional copies of the guide and referenced resources from our library.

For more information please contact:

The Women's Policy Office at (709) 729-5009

You can also visit our Home page:

www.gov.nl.ca/exec/wpo
Gender analysis seeks answers to fundamental questions such as who does or uses what, how and why. The purpose of gender analysis is not to create a separate body of social knowledge about women, but to rethink current process—such as natural resource use and management, economic adjustment and transformation, or demographic changes—to better understand the gender factors and realities within them. (SD Dimensions, 3/7/98)

**what do we mean by gender equity?**

Gender equity is the process of being fair to women and men. To ensure fairness, consideration must be given to the distinctions in women's and men's lives including their roles and responsibilities and access to resources. Measures must also be taken to address historical and social disadvantages that have led to inequities. *Equity leads to equality.*

In the area of training, for example, we have found that opening up programs to women which may formerly have been available only to men, does not ensure equitable representation. Women continue to be seriously under represented in apprenticeships. Special measures may be necessary in order to address women's specific needs. Child care concerns may need to be considered and negative attitudes and stereotypes among co-workers addressed (Wismer and Lior, 1994).

**what about men?**

The question is often asked whether gender inclusive analysis also applies to men's lives? Although it is a tool developed to correct inherent policy and program biases toward women, it can certainly detect issues that may be of particular concern to men. For example, in Newfoundland and Labrador the percentage of injuries that limit normal activities is almost twice as high for men than for women. Also, more men than women die of diseases of the circulatory system in all health regions of the province.
considering differences in the lives of women and men

Applying a gender-inclusive analysis to policy and program work requires an awareness of the factors that influence women's lives. An examination of key issues and trends in our province demonstrates some of the economic, social, demographic, technological, and political distinctions between women and men. Although the trends show many positive changes, there is still evidence of systemic discrimination in many facets of women's lives. An examination of these issues and trends is important in understanding the current context for women in our province. A summary of some of the key factors are described below.

Family Structure

Major changes have occurred within families in the past few decades. Some of these changes are due to the increase in the divorce rate, fewer people getting married, and the increase in the number of common-law families. In Newfoundland and Labrador changes have also been occurring due to out-migration and relocation to urban centres to find work and in some cases to move closer to personal care and health facilities. These changes have a tremendous impact on women. For example, most lone parent families in the province are headed by women. With the increase in our aging population, more women have the added responsibility of caring for elderly parents. These and other family responsibilities continue to place restrictions on the type of work women do, access to training, attachment to the labour force, and mobility.
People with disabilities, about 15% of the population of Newfoundland and Labrador, experience all the social problems of poverty, housing, unemployment, access to education and training. Just over 58% of all disabled females report moderate and severe disabilities as compared to 49% of males. Due to restrictions in ability women may find it more difficult to find work and more challenging to be independent.

(Stevenson, s99, p.5, 1.)

In the House of Assembly, women made gains in the 1996 election and the 1997 by-election. Eight of the 48 MHA's are female (16.6%). In 1997 women were 25% of Cabinet members.

(Stevenson, Women's Policy Office, 1998.)

Health and Social Issues

The definition of health has been changing to include more than just physical well-being. The major determinants of health include such factors as income, social status and education. Reproductive health, struggles with poverty, and the trauma of violence lead to unique health considerations for women. For example, there are still a significant number of births to unmarried teenagers. Statistics Canada reported 9.5% of all live births in Newfoundland and Labrador in 1995 were to women aged 19 and under. The fact that women can expect to live approximately 6 years longer than men, during a time of an aging population, poses particular challenges. For example, more women than men are residents of long term care facilities in the province. In 1996 the Department of Health reported that 69% of the residents of these facilities were female.

Legal and Political Implications

Most instances of overt discrimination have been eliminated in our province and we have a mechanism through the Human Rights Commission to deal with individual complaints. However, gender biases still occur in policies and legislation and in the interpretation, application, and enforcement of laws. Many laws and policies are drafted and programs are developed without the input of women, thereby possibly overlooking their unique experiences. As a consequence they can unintentionally discriminate against women. Changes in legislation and policy have made important strides for women. For example, in December 1997 the Newfoundland Government passed Bill 21, an act to amend the provincial Human Rights Code to include sexual orientation as a prohibited ground of discrimination. Gender equity is recognized as a principle in the membership of Regional Economic Development Boards.
Investing in People – the economy and spirit of this province will be strong only if the people are strong.
(Social Policy Advisory Committee, 1997).

In the public sector, as much as in the private, the heightened focus on service and results supports movement away from monolithic, bureaucratic structures to more flexible and responsive forms of organization. Ideally, governments will work efficiently and effectively to meet the needs of their citizens, within a context of wider democratization and citizen involvement (Dechman & Neumann, March 1998, p.1).

Social Benefits

Women and their children comprise a large portion of the province’s poor. Women are usually the primary caregivers within families and contribute greatly to their communities in paid and unpaid work. A heightened awareness and sensitivity to the diverse needs and concerns of women can reduce the risks of further marginalization and enhance the well-being of women and their children.

Responsive Government

‘Best practices’ of government means following procedures that produce desirable results. Paying attention to the needs of women in policy and program development is another step in helping women achieve full participation and reach equal status in society. Because gender inclusive analysis helps identify any negative impact the policy might have on women, it leads to more effective public policy – ‘doing the right thing’. As well, it enhances efficiency by avoiding possible mistakes which consume much time and energy – ‘doing things right’ (Dechman and Neumann, 1998). Gender inclusive analysis does not offer instant solutions, but is a different way of doing policy and program work that is in keeping with today’s challenges and is very much on the leading edge of policy formation.
Gender and diversity need to be included as an integral part of the whole policy and program cycle, not simply an add-on at the end of the process. In some cases gender issues may appear central, such as the examination of child care policy. In others, the gender implications may not be obvious at first glance but may emerge later in the policy cycle. For example, rent increases to low rental housing units may appear to have a similar impact on all renters who are recognizably low income. However, in examining the data it becomes clear that a significant percentage of residents are elderly women who are on fixed income and will be particularly impacted upon by this change. As well, they are a group of people who are not highly visible and their input may be overlooked.

We all have values and life experiences that have shaped our views of what is important in analyzing and developing policy and programs. These experiences can be a valuable source of knowledge in helping us understand certain issues but may also bias our perspective and actions. Bias means making a pre-judgement about a person or situation based in the absence of information or factual evidence. We all have acquired some biases and it is important to understand how they might get in the way of fair and equal treatment of particular groups or individuals.

Because biases or prejudices are learned they can be unlearned. For example, in our society, there has long been a bias toward women drivers. This view has been changing though as statistics show that young men, in particular, have more accidents. Based on these figures, insurance companies consider young males as a higher risk group than young females and set rates accordingly.
the policy/program development cycle

**step 1 identify the issues**

Policies/programs generally respond to an issue or need identified within government or the community. This stage involves determining the nature, scope and importance of the issue for the people affected within the context of the current policy environment that warranted placing it on the agenda. It is a critical stage because how you see and define the issue can affect your analysis and response throughout the policy/program development cycle.

questions to ask

1. **What is the issue(s)?**
   * Examine how your own gender, experiences, values, beliefs, assumptions and circumstances affect your understanding of the issue.

2. **Who says it is an issue(s)?**
   * Examine the groups that are most likely to be affected by the issue so that the diverse and different experiences of women and men are taken into account.

3. **What factors are influencing this issue(s)?**
   * Consider how factors such as age, sexual orientation, colour, race, ethnicity, ability/disability, and socio-economic status may modify the different experiences of women and men.

4. **Is there a history with this issue(s) and if so how might that influence the current situation? Why has it become an issue for the people at this time?**
   * Consider past major events such as the Ocean Ranger disaster or political decisions such as the cod moratorium. Have such events precipitated the issue?
There are possible biases that could influence which groups of people receive priority for work. For example, some sectors of society believe that men should be granted first choice for jobs in the resource industries because they have families to support financially and the type of work is more suited to males.

There are key gender factors to consider:
* The statistics show a major gap between women's and men's income in the province and that female lone parents have the highest incidence of low income of all family types in the province.

* Women have been seriously underrepresented in the natural resource sectors and yet many women are very interested in and capable of performing in these fields.

* "There are barriers which limit the degree to which women interested in construction work engage in and complete appropriate training; seek, are hired for, and are integrated into the labour force" (Grzetic, et.al. 1996).

* Aboriginal women have special concerns regarding their participation in Voisey's Bay development.

There is a history that is also important to consider:
* In the 1985 Federal/Provincial Atlantic Accord, Newfoundlanders received preference for employment (and project-related training) on the Hibernia project (Grzetic, et.al. 1996).

* Equitable hiring policies and initiatives were put in place through the HRDC Designated Groups Policy and NODECO'S Equitable Hiring Policy.
step 2 define desired goals and outcomes

Once you have defined the issue(s) and determined that action is desirable and possible you will begin the process of identifying desired goals and outcomes for a policy/program to address the issue(s). In a results-based planning approach this is really the first step in the cycle. A clear path or direction is charted and any issues that arise are considered in relation to the desired goals and outcomes. An analysis of both intended and unintended outcomes also considers the degree to which the policy can meet or hinder other policies or government objectives. The tasks involve setting outcome indicators, establishing monitoring processes for accountability, and identifying partners in defining outcomes. It is at this stage that you begin to design the evaluation process, an important part of ensuring accountability for the results.

questions to ask

1. Who is the policy/program intended to benefit?
   * Consider whether some groups of women will be more impacted than other groups.

2. What goals and outcomes does government want to achieve with this policy/program?
   * Analyze the expectations for outcomes (from government, the public, other stakeholders) to ensure they take into account both women and men, and they do not unintentionally incorporate existing stereotypes or biases.

3. How do your goals and desired outcomes fit with other government values, goals or policy directions?
   * Consider the ‘big picture’, for example, strategic plans developed by government.
considerations

You may want to determine:
* Who the groups of people are that will most likely benefit from the program. You know that women who are lone parents comprise a large percentage of the people on social assistance.

* What government expects to achieve in the short term to realize the long term goal. For example, what percentage of people can be expected to be employable at the end of the training?

* How this initiative fits with other commitments to reduce unemployment.

* What success will look like, for example, enrollment and completion rates. Are there also qualitative measures that must be considered, such as increases in self-esteem and independance?

* What issues or factors may impede participation in the program, such as lack of available child care and transportation.

* What incentives may improve participation in the program, such as flexible hours and work placement time.

* What methods will be used to monitor and evaluate the program.

action

* Examine the demographics of the people on social assistance. You may want to look more closely at statistics related to gender, age, numbers of children, age of children, education levels, and work history.
step 3 research and consultation

This step looks at what knowledge is needed to inform the decision making process. It also helps you to refine the goals and outcomes you developed in Step 2. Available and relevant data sources, and partners in data gathering and analysis are identified.

questions to ask

1. What information is required to ensure that all perspectives will be taken into consideration? What are the research questions and who determines them?
   * Request information from community-based organizations. The Women’s Policy Office maintains mailing lists of women’s organizations in the province.

2. What is the analysis seeking to determine?
   * Consider for example: cost/benefit, social impact, effect on government priorities.

3. Is the available information sufficient and appropriate to define the policy/program? Do you need to generate primary data?
   * Break data down by gender – including data on aboriginal people, people with disabilities, visible minorities, and any other affected groups.
   * If you cannot locate gender-specific data, seek information in the form of case experience or administrative data.

4. Who will be partners in information gathering/provision? How will you ensure these partners are able to participate fully?
   * When seeking the input of community groups, take their operational realities into account – women’s organizations...
You may want to:

* Examine the gender breakdown of displaced workers in that region due to the cod moratorium. You know that a major fish plant closed down and many of the workers were women.

* Determine to what extent environmental impacts have been assessed.

* Assess how many and what types of jobs will be generated from the venture and whether people currently unemployed in the region will benefit.

* Assess the training needs of people to assist with the transition to a new industry. Are there any unique needs for women?

* Conduct a data analysis of the region: number of people unemployed; number of people displaced from the fishery; demographics including age, gender, and level of education.

* Conduct an analysis of the proposal to determine if environmental requirements have been addressed.

* Conduct an analysis of cost effectiveness to determine benefits to the region such as number of jobs created, and regional economic development.

* Consult with local groups such as the regional economic zonal board to determine whether studies have been conducted regarding the economic viability of aquaculture farming in the region.

* Consult with local groups such as women’s groups, unions to determine training needs to make the transition to the new industry.
3. What are the direct and/or indirect implications of each option? Could there be unintended outcomes if that option were chosen?
   * Identify the consequences of not adopting gender-inclusive options for government and for women and diverse groups for both the short and long term.

4. Who would implement each option and what resources are required?
   * Determine how any differential consequences based on gender, and their social and economic costs, will be communicated to decision-makers.
   * Outline methods to ensure that the policy is implemented in an equitable manner taking gender and diversity into account.

5. On what basis will the recommendation(s) be made and who will be involved in choosing the option recommended?
   * Explain the consequences of the recommended option in relation to government's commitment to gender equity, and other strategic objectives of government.

6. What are the underlying assumptions and values implicit in the option being recommended?
   * Include gender equity as a key element in weighing and recommending options – not simply as an 'add-on'.

7. Is the recommended option free from unintended outcomes and/or restraints (legal, economic, social, cultural, environmental, etc.)?
   * Identify any legal, economic, social or cultural constraints to gender-equitable participation and propose mitigating measures.
   * Consider aspects of the policy environment (fiscal, government strategic priorities, other policies, current public opinion, government commitments, etc.) that might impinge on the recommendation.
* You consult with women's groups and seniors to gain their input on the proposed options and others that may offer improvements for women.

* You examine the options within the current policy environment including: relation to government's commitment to gender equity and other strategic objectives, other policies and priorities, and public opinion.

* You make a recommendation based on the results of your research and analysis.

step 5 communicate the policy/program

The participation and acknowledgement of partners and consulting groups can be a key part of communicating policies inside government and to the public. Timing, choice of media, language, and public involvement are important to ensure that government intent and the impacts of the policy, program and legislation are understood. The way the recommended policy/program is communicated can play a significant role in its acceptance and implementation.

questions to ask

1. What is the message you want to communicate and to whom?
   * Highlight the gender implications of the policy/program in your communications products.

2. How will the policy be communicated? What information will be given to whom? How?
considerations

* The groups who actively participated and gave so generously of their time may want special consideration and recognition.

* A number of people with a visual disability took part in the consultation process and requested the results in braille and audio tape.

* A number of young women in one community raised concerns during the research phase that not enough attention was being given to the needs of youth.

* At some of the consultations men were very vocal that the problem was more than a women's issue and expressed genuine desire to play an active role in prevention strategies.

action

* You hold a press conference and invite participating groups and ensure copies of the report are available for them.

* You have available a copy of the report in braille and audio tape and notify the Canadian National Institute for the Blind and the Consumer Organization for the Disabled of its availability.

* You ensure that the interested youth group is notified.

* In your message to the public you express clearly that it is women who are most vulnerable to violence and you recognize other vulnerable groups.

* You commend the work of women's groups in bringing the issue forward.

* You discuss the importance of involving youth in seeking solutions.
4. What resources are available to conduct the evaluation? Will it be internal/external or both?
* Include the target groups in the design and implementation of your evaluation research.

5. Who will establish the criteria including the indicators, data sources and measures? See Step 2.
* Consider the factors that may influence your design such as gender, age, culture, and education level.
* Determine whether the research approach is sensitive to these factors. For example, including qualitative methods with quantitative will enable people to describe their experiences in their own words and help identify issues of gender and diversity.
* Construct your design to allow for the collection of disaggregated data.

6. Who will report it and how?
* For example, will the policy/program be transparent and easily understood by the public?

7. How will the evaluation results/recommendations get translated into action?
* For example, how will recommended changes to a program be implemented?

case example

Participation of Women on Regional Economic Development Boards

The Province of Newfoundland and Labrador began a process of implementing the development of twenty zones of economic planning. One of the established outcomes was to “ensure approximately equal representation of males and females on all boards in the zones” (Women’s Policy Office, 1996, p.1). It was agreed prior to implementation that an evaluation would be done to assess progress in this area.
action

* You hire a researcher to conduct:
  1) focus groups with a sample of women from the Boards
to discuss their experiences regarding participation;
  2) interviews with chairs/managers of the boards to look at
their strategies/approaches to solicit women’s participation;
and
  3) a review of strategic plans to examine gender diversity
considerations.

* You request an analysis of the data on representation to
determine the composition with respect to diversity.

* You establish a plan for reporting results to ensure meaningful
feedback to government, boards, women’s groups, and
other interested community groups regarding progress to
date and recommended improvements.
gender equality indicators: indicators point out directions for action and are important 'signposts' for tracking progress. Gender equality indicators provide a composite measure of women's advancement toward the goal of economic and social equality. For example, the total workload index (in the "Economic Gender Equality Indicators") combines different types of economic activity including paid and unpaid work.

gender equity: is the process of being fair to women and men. To ensure fairness, measures must often be available to compensate for historical and social disadvantages that prevent women and men from otherwise operating on a level playing field. Equity leads to equality. A society which fosters gender equity benefits everyone in the long run.

quantitative versus qualitative research: Quantitative research limits data collection to certain predetermined responses or analysis categories based on a standardized framework. For example, the experiences of people in programs and the key variables that describe program settings are fit into standardized categories to which numerical values are then attached. By contrast, the researcher using a qualitative approach seeks to capture people's experiences in their own words. Methods such as focus groups and open ended questions aim to understand people's views in some depth.

systemic discrimination: is caused by policies and practices that are built into systems that have the effect of excluding women and other groups and/or assigning them to subordinate roles and positions in society. Often a mixture of intentional and unintentional discrimination is involved. Although discrimination may not exclude all members of a group, it will have a more serious effect on one group than on others. The remedy often requires affirmative measures to change systems. Employment equity policies are an example of attempts to address systemic discrimination against women, aboriginal people, visible minorities and people with disabilities.


Human Resources Development Canada, Women's Bureau, Strategic Policy Branch (March 1997). *Gender-based Analysis Backgrounder*. Ottawa: HRDC.


<table>
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<tr>
<th>step 1</th>
<th>step 2</th>
<th>step 3</th>
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<td><strong>identify the issue</strong></td>
<td><strong>define desired goals and outcomes</strong></td>
<td><strong>research and consultation</strong></td>
</tr>
<tr>
<td>Clarify values to determine possible stereotypes or biases that could influence the analysis throughout the cycle.</td>
<td>Critical step in results-based planning to chart a clear direction and set the foundation for evaluation.</td>
<td>Critical step in building knowledge to refine goals and outcomes and inform decision making.</td>
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<td>Determine the nature, scope and importance of the issue for people affected.</td>
<td>Determine the key groups of people who will be affected and whether some groups need special consideration.</td>
<td>Consider what information is required to ensure inclusion of all perspectives.</td>
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<td>Examine the current policy context that warranted putting it on the agenda.</td>
<td>Determine the expectations for outcomes from all stakeholders to ensure inclusion of diverse views.</td>
<td>Determine what type of analysis is needed such as social impact or cost/benefit.</td>
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<td>Consider critical factors that influence the issue – gender, age, sexual orientation, colour, race, ethnicity, ability/disability and socio-economic status.</td>
<td>Consider the “big picture” such as strategic plans developed by government.</td>
<td>Consider input from community groups when determining the partners/sources in information gathering/provision.</td>
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<td>Consider the history and any root causes such as unequal distribution of resources.</td>
<td>Establish outcome indicators to determine success and consider multiple indicators to account for effects of gender/diversity.</td>
<td>Determine the scope and nature of the research design with sensitivity to factors related to education, culture, gender, etc.</td>
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<td>Determine if further action is needed and consult with people who can provide guidance on gender/diversity components.</td>
<td>Consider what gender/diversity factors could interfere with achieving the outcomes and make necessary modifications.</td>
<td>Construct the research design to allow for the collection of disaggregated data and consider both qualitative and quantitative methods.</td>
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