

Sidewalk Labs - Responsible Data Impact Assessment

Status: Approved for field test (September 19, 2018)

A Responsible Data Impact Assessment (RDIA) is a process that looks at the full range of rights and interests of all parties in a data processing activity to achieve an outcome when data use may impact people in a significant manner and/or when data enabled decisions are being made without the intervention of people.

SECTION 1: THRESHOLD QUESTIONS	Guidance	Responses
<p>Project Name/Description</p>		<p>The project is a field test of “CommonSpace”, a proposed map-based data collection mobile application that makes it easier to record observations of human activities in open spaces - a method known as public life studies. Public life studies are used to develop a better understanding of how public spaces serve the needs of people and communities.</p> <p>How it will work: People who are interested in conducting a public life study - city planners, designers, community groups, etc - can create a study using a web portal for CommonSpace. A study organizer begins by defining their research question, and then configuring the needed observations into the app.</p> <p>Then, they recruit surveyors to conduct the study, who are assigned “shifts” in the public space under study. The surveyors spend time in the space and use the CommonSpace mobile app to record data about what they observe at defined intervals to</p>

		<p>capture a snapshot of public life activity. CommonSpace implements an open data standard known as the Public Life Data Protocol.</p> <p>Afterwards, study organizers are able to download the data, and are able select a toggle to post their study and publish the underlying data on a public data portal.</p> <p>How the field test will work: Sidewalk Labs will work with the organizations the Gehl Institute and Park People develop a minimum viable product that supports data collection for a public life study in R.V. Burgess Park, Toronto. The purpose of the field test is to understand how a digital tool could simplify the process of collecting data and gather feedback on the on the potential of the tool. For the field test, Sidewalk Labs will manually configure the CommonSpace app to set up the data collection form and the study shifts for the surveyors, and provide the data to Park People for their analysis.</p>
<p>Project Objective</p> <p>What is the objective for this <i>project</i>? For example, understanding how people use public spaces, improving building efficiency</p> <p>If a pilot or partnership, how does it align with the Quayside project mission?</p> <p>Does the activity fit within a larger theme of work that is currently being contemplated or undertaken?</p>	<p>Quayside mission</p> <p>Buildings: A built environment that is more usable, efficient, and affordable</p> <p>Mobility: A cheaper, safer alternative to the private automobile for every trip</p> <p>Public Realm: A public realm for the entire region that is delightful and vibrant year-round</p> <p>Sustainability: A truly climate positive community</p>	<p>A people-first public realm starts with knowing and understanding how our shared spaces function.</p> <p>Understanding how people use parks, plazas, and neighbourhood spaces enables students, researchers, communities, and governments alike to understand the impact of design and programming on public life. Public life data can support civic action, policy revisions and decision-making that affect how spaces are designed, built, operated and programmed.</p>

	<p>Social Infrastructure: A close-knit, healthy community with seamless access to vital daily services</p>	<p>However, the complexity of preparing a public life study can be a barrier to understanding how our public spaces work. The objective of CommonSpace is to make it easier to conduct these types of studies. Our hope is to enable all types of people to use public life data in their work, from research to planning to civic engagement.</p> <p>This project builds on a decades-long tradition of using data to understand how people interact with parks and public spaces in order to improve quality of life. CommonSpace implements the Public Life Data Protocol, a data standard published by Gehl Institute, in partnership with Copenhagen, San Francisco, Seattle and the Gehl practice, to standardize the data collection process, support evaluating the impact of public spaces, and enable new innovations in making cities for and with people.</p>
<p>Stakeholders</p> <ul style="list-style-type: none"> • External: third parties/partners involved in the project. • Internal: other pillars, investments, MIDP 		<p>External:</p> <ul style="list-style-type: none"> • <u>Park People</u>: Park People is a project partner in the development of CommonSpace. We plan to work with them to test a first iteration of the app in partnership with the Thorncliffe Park Women’s Committee, a community organization that was awarded one of Park People’s Public Space Incubator grants in 2018 for their community-run park cafe in R.V. Burgess Park. The test is designed to help both groups understand the impact of their work. • <u>Gehl Institute</u>: Gehl Institute is a project partner in the development of

		<p>CommonSpace. They bring domain expertise in the development and application of public life study tools, including their leadership in a global collaboration to develop and publish the Public Life Data Protocol, a data standard for public life studies.</p> <p>Internal:</p> <ul style="list-style-type: none"> • <u>Public Realm Pillar</u>: The development of CommonSpace is in direct support of Sidewalk Labs' public realm strategy for a more responsive public realm, enabling shared spaces that are shaped by the community and informed by data.
<p>Nature and Source of Data</p>	<p>If project is at the concept stage, what data do you anticipate collecting or using? Please describe all you know right now - including any data that is contemplated at later stages.</p>	
<p>Does this project involve collection or use of data that is not about people?</p> <p>Please list and describe:</p> <ul style="list-style-type: none"> • Sensor data (e.g. environmental sensors) • External data sources (e.g. census records) 	<p>Describe the type of sensors, SWL's role (i.e. placing sensors or gathering data from other sensors)</p>	<p>Yes. CommonSpace uses basemap data from the public Google Maps API. CommonSpace also allows for study organizers to input custom data about the built environment (e.g., location of play structures, benches, tables, etc) that are displayed on the map to help orient surveyors. Study organizers also define data collection zones for the survey.</p>
<p>Does this project involve collection or use of data about people?</p> <p>Please list and describe:</p>	<p>If yes: complete Section 2 of the RDIA</p>	<p>CommonSpace supports the collection of data about the characteristics of people and their activities in the public realm, through the practice known as public life studies. This falls under the</p>

<ul style="list-style-type: none"> ● Personal Information (information about an identifiable individual) ● Non-identifying information about individuals (“non-personal data”) ● De-identified Personal Information (e.g. computer vision where individuals cannot be identified) ● Aggregate information about people (e.g. pedestrian count) ● Online behaviour (e.g. IP addresses, cookies, logs, analytics) 		<p>category of non-identifying information about individuals (“non-personal data”).</p> <p>The app is not designed to collect personal or identifiable data for anyone whose activity is observed through a public life study.</p> <p>Broad demographic attributes of people in the public realm is determined by and entered into the app by the surveyor conducting the study. A surveyor may input free-form comments about their observations; this is typically for quality assurance purposes or activities not captured in a standard format in the Protocol. Surveyors will be instructed not to enter personal information into the free-form comments field and in-line instructions in the app will remind them of this.</p> <p>The app records data using the Public Life Data Protocol - a data standard published by the Gehl Institute, in partnership with Copenhagen, San Francisco, Seattle, and the Gehl practice to standardize the data collection process across cities and places</p> <p>CommonSpace collects user data for the purpose of logging in and authenticating. Users (both study administrators and volunteers) can choose two ways to log in: 1) Google Sign-in with the OAuth 2.0 standard, or 2) creating a new account with CommonSpace. In option 1, CommonSpace receives the user’s name and email address associated with their Google account. In option 2, CommonSpace collects the user’s name, email address, and password. CommonSpace uses location data of the surveyor’s device to show them their location on the map for the purposes of orientation, but this data is not stored. The app</p>
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		requests permission for access to this data before it can use it.
<p>Is the data or anticipated use of the data sensitive?</p> <p>Sensitive categories of data and/or use include information that is used to analyze or make decisions based on race, ethnic origin, religion or philosophical belief, gender, sexual orientation, physical or mental health, information or data that could be used to facilitate identity theft.</p> <p>A sensitive use of data may also be where there is a reasonable expectation the use of the data would be embarrassing or be considered sensitive to the individual whose data it is.</p>		Collected data is not considered highly sensitive. The two demographic data fields collected by CommonSpace, in accordance with the Public Life Data Protocol, are perceived age and perceived gender. There will be no sensitive use of the data.
<p>What are all the sources of the data, internal and external?</p> <p>Internal sources: List interactions with other projects/systems where data was already collected, as well as new data that will be collected for this project (e.g. sensors, surveys, apps)</p> <p>External sources:</p> <ul style="list-style-type: none"> • How was the data originated from each source and whether each source is a legitimate entity? • How reliable is the source for the data activity? • Who has custody or control over the source data and what are the governance arrangements? • How are we maintaining attribution of the data source through the data lifecycle? If one source of data is combined with others, how will we 	<p>Answer these questions for EACH Type of data listed above. For example:</p> <ul style="list-style-type: none"> - Data Type/Use 1: <ul style="list-style-type: none"> - Sources - Reliability - Custody/Control - Data Type/Use 2: <ul style="list-style-type: none"> - Sources - Reliability... 	<p>Public life study data:</p> <ul style="list-style-type: none"> • <u>Source</u>: Data is entered into an app by the surveyor or study organizer • <u>Reliability</u>: Surveyor-based collection is as reliable as possible for this type of observed data • <u>Custody/Control</u>: For the purposes of the limited field test, Sidewalk is responsible for the custody of the data, and will provide the data from the field test to Park People and Thorncliffe Park Women’s Committee for their public life study purposes. <p>For the future hosted deployment of the app, Sidewalk maintains custody of the data with control granted to study organizers, who have full ability to manage and delete data. Sidewalk secures this data with best practices including encryption,</p>

<p>keep track of where each data element came from?</p>		<p>and records access through logging.</p> <p>Users may also run their own deployments of the app using the open-source code, which would enable them to store source data themselves.</p> <p>Sidewalk Labs will not access the data for its own benefit, sell it, or share it with third parties.</p> <ul style="list-style-type: none">• <u>Attribution</u>: Data collection is initiated by a study organizer, and the surveyors are the source for data that is captured by CommonSpace. The Public Life Data Protocol includes data elements that provides the context of the overall study, and records the entity organizing the study. <p>User data:</p> <ul style="list-style-type: none">• <u>Source</u>: The data is provided by a user during sign up or log in through the app.• <u>Reliability</u>: Names provided are verified when volunteers and study organizers meet in person for trainings.• <u>Custody/Control</u>: In the case of Google Sign-in, Google maintains custody and control of the source data, which is provided upon request by CommonSpace. In the case of a CommonSpace account, CommonSpace has custody and control of the data.• <u>Attribution</u>: In the case of Google Sign-in, attribution is built in as the user data comes upon request. In the case of a
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		CommonSpace account, the data is not transformed or combined
<p>What are the steps being taken to determine the relevancy of the data for the purpose of the activity?</p> <p>What steps are being taken to determine the accuracy/relevancy of source data and if the source data will be accurate enough over time? Has consolidation/transformation impacted the data in such a way the accuracy is affected? Are there concerns about the quality of the final data set relative to the purpose of the activity?</p>	<p>Answer these questions for EACH Type of data listed above.</p>	<p>CommonSpace relies on the Public Life Data Protocol to determine what data is considered relevant for public life studies. The Protocol is under continuous development and revision by its founding team.</p> <p>Concerns about the quality of the final data set are addressed by the study organizer. They should be reviewing the data captured in the app for completeness and conformity with the design of their specific public life study.</p> <p>User data is verified by study organizers during volunteer training, when volunteers meet in person with study organizers and are assigned to shifts by name.</p>
Sources of Data		
<p>Is the data provided by an individual – either to the project or to a participating partner (i.e. the result of a direct action taken by the individual)?</p>	<p>Consider and comment whether the data is initiated (the product of individuals taking an action that begins a relationship), the data is transactional (created when the individual is involved in a transaction), or the data is posted (created when individuals proactively express themselves)</p>	<p>The data about people’s behaviour in public space is observed and recorded by the surveyors assigned to the study.</p> <p>The surveyor is required to log into the app in order to enter data on their observations for their assigned shift.</p>

<p>Is the data observed (created as the result of individuals or activities being observed and recorded)?</p>	<p>Consider and comment whether the individual data is engaged (instances in which individuals are aware of observation at some point in time), the data is not anticipated (instances in which individuals are aware there are sensors but have little sense sensors are creating data pertaining to the individuals), or the data is passive (instances in which it is very difficult for the individuals to be aware they are being observed and data pertaining to observation of them is being created).</p>	<p>The data is the result of observations made in public spaces. Individuals being observed are not explicitly notified of a study being conducted, but surveyors are trained to answer questions about the study when asked.</p>
<p>Accuracy of Data</p>		
<p>What are the steps being taken to determine the relevancy of the data for the purpose of the activity?</p>	<p>What steps are being taken to determine the accuracy/relevancy of source data and if the source data will be accurate enough over time? Has consolidation/ transformation impacted the data in such a way the accuracy is affected? Are there concerns about the quality of the final data set relative to the purpose of the activity?</p>	<p>The relevancy of the data for studying public life is determined by inclusion in the Public Life Data Protocol, as well as by the study organizer who defines the research question for the study and identifies the appropriate data fields from the Protocol.</p> <p>Since the data is not consolidated or transformed, there are no concerns that the data is transformed in such a way that make it inaccurate or irrelevant for the purpose of the activity.</p> <p>The quality of the final dataset is dependent on the rigor with which the study organizer and the surveyors adhered to the public life study design, and their diligence in completing the assigned study observation shifts.</p>
<p>Governance of Data</p>		

<p>Who are all the possible stakeholders and parties involved or related to the data activity? What are their interests and potential concerns</p>	<p>Stakeholders and/or parties are very broad and apply to any party impacted by the data. For example, a stakeholder for a framework could be a regulator or advocacy organization. Stakeholders for data and data uses include data partners. However, stakeholders can also include those interested in the success of a data use.</p>	<p><u>Public life study sponsors and administrators:</u> The immediate stakeholder in data collection is the sponsor of or person who is administering a public life study. This stakeholder uses the data collected to inform their work, such as research, planning, evaluation, or policy development. They are potentially concerned with the quality of data that is collected by the surveyors.</p> <p><u>People who participate in a study:</u> The surveyors who participate in conducting a study. They are likely to be interested in the outcomes of the study. They are potentially concerned with the difficulty or complexity of their surveying task.</p> <p><u>People who use public space:</u> The end beneficiary of public life activity data are the people who use the places that are studied. The public life data that is collected can be used to understand how the design and programming of public spaces affect public life, or guide changes that enable a different mix of activities. They are potentially concerned that they will not like changes that come after a study is conducted.</p>
<p>If the data has been collected by, shared with and/or received from others, do those parties have authority to share? Are there restrictions on data that would affect the use of the data?</p>	<p>What are the steps being taken to ensure the authority of those parties can be relied upon?</p>	<p>For the field test, Sidewalk Labs will provide the data to Park People and Thorncliffe Park Women’s Committee, and they have full authority to use and share the data. Sidewalk Labs does not place any restrictions on the use of the data.</p> <p>In the future hosted version of the app, data that is made publicly accessible by the study organizers will be published under an open data licence (to be determined).</p>

<p>Sidewalk Labs has committed that data will be “Publicly Accessible by Default”. Does this data activity result in publicly accessible data? If not, why?</p>	<p>is there any reason why the data would not be made open?</p>	<p>CommonSpace will be built to support making data publicly accessible, and Sidewalk Labs will encourage study organizers to publish their data and make it publicly accessible. Data is not publicly accessible by default, and study organizers must toggle a button to publish the data.</p> <p>Study organizers may elect to not make the data available; for example they may determine that the study was incomplete or poorly conducted such that the data would be misleading.</p> <p>In the event Sidewalk Labs uses CommonSpace to collect public life data in the future, we will make the data publicly accessible.</p>
<p>SECTION 2: FULL RDIA</p>		
<p>Identify all the parties impacted by this data activity, and the impacts it will have.</p>	<p>For example, people who live in Quayside, people who visit 307, users of an app, etc.</p> <p>List individuals, groups, communities, society.</p>	<p><u>Public life study sponsors and administrators:</u> This is the party who initiated a public life study, such as municipalities or community groups. The data collected impacts their work in that they will use the data to seek insights about how people are using a particular public space.</p> <p><u>Study surveyors:</u> This is the party who collects the data as a volunteer or paid surveyor for a public life study. Study surveyors often find benefit from spending focused time learning about their park. Participating in a study is often rewarding for participants who gain local insight, feel a connection to their community, and feel more</p>

		<p>ownership over what happens in their neighbourhood.</p> <p><u>People who are using the public space being studied:</u> This is the party whose activities and attributes are recorded as a part of a public life study. The scenario in which they could be negatively impacted would be during data collection, when they could notice data collection taking place and could feel upset or threatened if they did not understand or believe the anonymity of data collection. There is potential for positive interactions as well, where a public space user has a conversation with a surveyor about the project and becomes invested or involved in improving the space.</p> <p><u>The local community:</u> Ultimately, it is the local community who is impacted by the data if insights from the data are used to affect programming, planning and design of local public spaces.</p>
<p>What are the stated and unstated expectations of these individuals, groups, and society for each use of the data?</p>	<p>Would anyone be surprised that this data is being collected or used in this way?</p> <p>Could the data be used in a way that may result in one individual or group being treated differently than others? For example, to determine if someone's eligibility for a service or benefit.</p>	<p>The purpose of data collection for a public life study is always explicit, in that a question needs to be defined for every study. The Public Life Data Protocol provides structure to the study by defining the metrics that are important to the understanding of public life, drawing on well-established research methods.</p> <p>There is a risk that someone could be surprised about the data being collected if the study was poorly designed, such that the research questions are not well supported or answerable by the data collected.</p>

		<p>There is a risk that public life activity data can be used to treat locations that vary in scale from a site to a neighbourhood, differently. For example, the data could result in a decision to direct funding to public spaces with the highest utilization, instead of trying to understand why some places are poorly utilized and directing funding towards adapting those spaces to community needs.</p> <p>However, by making the data publicly accessible, these risks can be mitigated by making the data that underlies decision-making available for all stakeholders to assess and analyze. Further, having the data is more informative than not having the data, when making the same funding or other investment decisions.</p>
Benefits		
<p>What are the benefits to the individual or groups of individuals?</p>	<p>Describe positive impacts, for example: more objective or safer interactions, better product selection and utilization, better access to new products and services, significant discounts, improved service or ease of use, more convenience or improved health and well-being. Improved financial condition, lower cost alternatives or increased availability.</p>	<p>The benefits and uses of public life studies are well documented, by organizations like Gehl Institute whose mission it is to advance adoption of the practice, and by the municipalities and professionals that utilize the methods as part of their work.</p> <p>CommonSpace makes it faster, easier, and cheaper to collect higher quality data for public life studies.</p> <p>The first benefit of CommonSpace is that studies can be completed more quickly, making it possible to both conduct more studies and derive insights rapidly. More public life data, collected in a variety of contexts and at more frequent intervals can</p>

		<p>contribute to a greater understanding of the factors that shape public life.</p> <p>The second benefit of CommonSpace is lowering the barrier of conducting a study, making them accessible to a wider range of stakeholders. Due to their complexity, studies today require significant professional and/or technical support to execute.</p> <p>With CommonSpace, it's easier for a smaller organization, like a neighbourhood community group, to conduct studies of local spaces. These groups are then able to support their contextual understanding of their neighbourhood with data, using standard metrics of public life in community planning discussions and consultations.</p>
<p>What are the benefits to society?</p>	<p>Describe the benefits that could be realized by someone beyond the immediate individual whose data is being processed. Consider factors such as: better/lower cost health care, greater access to health services, or better health outcomes or an improved ability to track and assess health outcomes; more accurate sensors or devices to detect or diagnose health conditions or to improve general wellness; improved education; environmental enhancements such as water conservation, energy cost reduction; infrastructure enhancements; economic improvement; more accessible/usable technology; increased job opportunities; protection of reasonable expectation of privacy, including anonymity; protection of freedom of religion, thought and speech or protection of prohibition against discrimination.</p>	<p>Public life studies are a well-established methodology to understand how public spaces are used. They can be used to shape designs, policies and decisions that help ensure cities allocate resources in a manner that suits the needs of their residents.</p>

<p>What are the benefits to other stakeholders?</p>	<p>Consider government stakeholders, partners, community groups, etc.</p>	<p><u>Public life study sponsors and administrators:</u> This is the party who initiated a public life study. The data collected benefits their work in that they will use the data to seek insights about how people are using a particular public space.</p> <p><u>Study surveyors:</u> This is the party who collects the data as a volunteer or paid surveyor for a public life study. Study surveyors often find benefit from spending focused time learning about their park. Participating in a study is often rewarding for participants who gain local insight, feel a connection to their community, and feel more ownership over what happens in their neighbourhood.</p> <p><u>Government:</u> This is the party who is generally responsible for the design, construction, operation and programming of publicly-owned spaces. This project benefits them by reducing the expense and complexity involved in conducting public life studies, which in turn have the potential to improve planning and decision making.</p> <p><u>Practitioners:</u> This includes professionals or space operators that are generally responsible for developing, funding and executing designs and/or programs for publicly-accessible spaces. This project benefits them by making it easier to measure the outcomes of those efforts on public life.</p> <p><u>Community Groups:</u> This includes residents, community members or other community stakeholders that have a relationship with a particular location or space. This project benefits them by making it easier to quantify and communicate to other stakeholders (such as</p>
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		<p>governments and practitioners) on whether those spaces are supporting their needs.</p> <p>Researchers: The study of public life - how cities and the built environment shape how people use spaces - is a decades-old practice that has led to the improvement of public spaces around the world. This project benefits them by making it easier to collect public life data to support their research. By promoting a data standard that supports comparison between studies conducted in a wide variety of contexts and locations, this project can help advance a more general scientific understanding of how the built environment affects society.</p>
Risks (Inherent)		
<p>Considering all the factors relating to the data, the likely data use, the identifiability and sensitivity of the data, what are the risks to the individual, groups of individuals, society?</p> <p>Determine and describe how the data processing could potentially impact the interests, rights and freedoms to individuals?</p>	<p>Consider the risks or increase in risks to the individual whose data is being used and that occur because of the processing being considered.</p> <p>Areas to consider include:</p> <ul style="list-style-type: none"> - physical harm, - financial harm, - reduced health and well-being or - reduced ability to move freely in society, - damage to reputation or embarrassment, 	<p>Provided the study is conducted by surveyors who are properly trained in making observations for public life studies, there is minimal risk to individuals that their identity or personal information is compromised as a result of being observed in a public life study using CommonSpace.</p> <p>There is a risk that group behaviours in aggregate are exposed, prompting a response that impacts individuals. The risk is heightened with at-risk populations who face structural discrimination. An example of this is if a public life study documents large numbers of people lying down which is then used to infer that there are homeless, or if a study documents commercial activities taking place in a plaza with no registered businesses.</p>

	<ul style="list-style-type: none"> - shock or surprise at the processing activity or the results of the processing, - inappropriate discrimination – such as where the discrimination is based on for example, classes such as race, age, religion, gender sexual orientation, or politics, - manipulation of needs or desires/wants of the individual (i.e. creation of a need where one previously did not exist) - negative impact of data that are the product of a probability-based process, such as a score, - data subjects who may be in a more vulnerable position than the organisation processing the data, such as children or elderly or less-educated or impoverished individuals, - larger volume processing (versus a small-scale pilot) 	<p>There is also a similar risk that public life study data is used to justify planning decisions that unfairly impact at-risk populations. For example, data could be analyzed in a manner that supports diverting funding away from particular communities, for example if low activity was interpreted to mean a lack of demand.</p> <p>There is a risk that surveyors input personal information into the free form comment field. This is mitigated by two factors, 1) instruction during training to not input personal information, and 2) text on the interface reminding surveyors to not input personal information. Furthermore, the free form comment field will not be published in publicly accessible data sets, limiting the impact.</p> <p>These risks support Sidewalk Labs’ efforts to make the data collected and information on the context of the study publicly accessible by default, so that all stakeholders can examine the data that underlies a recommendation or decision.</p>
<p>Is it foreseeable that data use might seem surprising, inappropriate or discriminatory or might be considered offensive causing distress or humiliation?</p>	<p>Would individuals be surprised by the data activity about them? Would the data activity about individuals align with the choices they have provided and the choices they have made? Determine whether there are other sensitivity issues with the potential insights and what aspect of collection/processing/analysis or use of</p>	<p>The risk of this type of data misuse is similar to the types elaborated in other answers. Data collected using CommonSpace and made publicly accessible could be misused to support an agenda of discrimination or embarrassment.</p>

	potential insights might be considered unfair to the individual or society.	
Is the accuracy and/or quality of the data appropriate for the data activity? Does the relative accuracy of the data have an impact on individuals/groups?	Determine the impact of inaccurate data on individuals/groups.	Surveyors who are not sufficiently trained in what the data fields mean may enter data incorrectly into CommonSpace, invalidating the results of the study.
Mitigating Risks		
What are the technical and procedural safeguards (mitigating controls) that are being implemented to prevent and mitigate risks described above should they occur (e.g. encryption and delinking of data or increased transparency)? How have privacy by design control standards been applied?	A mitigating control is a type of control used to discover and prevent mistakes that may lead to uncorrected and/or unrecorded misstatements that would generally be related to control deficiencies. A mitigating control may help to remedy any elevated risk identified in the analyzes above. Determine what risks can be mitigated and how these risks can be mitigated	Privacy by design was implemented in the conceptual design of CommonSpace. The app is designed to only collect data that is required for public life studies, in accordance with a published data standard. The overarching risk of CommonSpace is that the data it helps people collect can be used maliciously to confuse, misinform, or deceive the public. To mitigate this risk, we embed transparency and accountability wherever possible. For example, data is only published in association with a study and the identity of the study organizer.
Are analytical driven models, insights or algorithmic decision making being used that could impact individuals?	Determine how long the potential insight might endure and determine whether potential insights could become less useful or valuable over time. Are potential insights progressive and sustainable (repeatable over time) and for how long are potential insights sustainable? Application of potential insights could impact behaviour in a manner that could reduce predictive value of insights over time.	No - Sidewalk Labs will not be using this data for these purposes. However, the study organizers or users of published datasets might use these techniques.

<p>Is there a less data intensive way to achieve the goals of the data activity (including potential insights)?</p>	<p>Determine whether the minimum possible amount of data has been used in the data activity or to obtain potential insights.</p>	<p>No - CommonSpace was purposefully designed to collect the minimum amount of data needed to support public life studies, as determined in the Public Life Data Protocol.</p>
<p>Is the data going to be shared externally with vendors, third parties (any other stakeholder)? If data is to be shared with any identified stakeholder is any of it user data (have appropriate mechanisms to ensure adherence to data obligations been put in place)?</p>	<p>If the product allows users to share their data with other users or serves user data publicly a PDD should be completed and core third- party sharing controls should be evaluated for effectiveness.</p>	<p>Yes - CommonSpace allows data to be published and made publicly accessible. Data will not be published automatically, and study administrators must select a toggle to publish the data set.</p>
<p>Does the data activity include mechanisms that explain how data is used, how benefits and risks to individuals are associated with the processing, and how individuals may participate and object where appropriate? Describe the notice, consent and control we provide the user.</p>	<p>Determine what the transparency and individual accountability mechanisms are and whether they are appropriate for the data activity use.</p>	<p>Yes - transparency is baked into the design of CommonSpace.</p> <p>The onboarding flow is designed to notify users that the purpose of the app is to collect public life data, and provides them with information and links to understand the practice.</p> <p>Before users log into the app, they are notified of why they are being asked for log-in information, and told exactly what information they are providing and to whom. They are also provided a link to our privacy policy and contact information in case there are questions.</p> <p>Once logged in but before entering a study view to enter data, users (these are surveyors) are shown the identity of the study organizers, and are given information about the study they are participating in.</p> <p>Surveyors are also trained on the purpose of the public life study and how to respond to questions</p>

		that members of the public may ask while they are conducting the survey.
PROJECT NET BENEFIT	Complete the Project Net Benefit Assessment	
Is there a net benefit?	Does an appropriate balance of benefits and mitigated risks supports the data processing activity. Consider are the risks necessary and proportional to the benefits? Have the risks have been mitigated to the extent possible? Are the mitigated risks sufficiently balanced by the benefits?	<p>Yes. Public life studies are widely considered beneficial to improving public spaces in the public interest. In Toronto, public life studies are increasingly used to improve our parks and streets, starting with TOCore and now as part of the City's park revitalization design process and helping measure the outcomes of the King Street Transit pilot.</p> <p>CommonSpace offers an improved method of conducting these studies that will result in more studies, by more communities, with more transparency into the underlying data.</p>
Does the data activity comply with all laws, cross-border, policy, contractual, industry or other obligations organizational policies and self-regulatory commitments?		Yes
<p>Does the purpose of the activity fit within the demonstrated values of society?</p> <p>"Values" is a subjective term, thus in answering this question, an objective standard should be referred to. What this standard is will depend on the nature of the product, project, pilot, or partnership.</p>		<p>Yes. Understanding how people use parks, plazas, and neighbourhood spaces enables communities and governments alike to understand the impact of design and programming on public life and better target resources. Urbanists have a decades-long tradition of using data to understand how people interact with parks and public spaces.</p> <p>The origin of public life studies can be traced to the early 1960s, with Jan Gehl's studies of people</p>

		<p>standing, sitting, waiting, and talking along Strøget, Copenhagen's main thoroughfare, which made the case for pedestrianizing the street. In the 1970s, William H. Whyte's video observations of New York City's Bryant Park led to key realizations that helped it become one of the city's most vibrant public spaces. Here in Toronto, public life studies are increasingly used to improve our parks and streets, starting with TOCore and now as part of the City's park revitalization design process and helping measure the outcomes of the King Street Transit pilot.</p>
<p>Have all the stakeholder concerns identified in the Governance of Data section been appropriately addressed?</p>		<p>Yes.</p> <p>The identified concerns include:</p> <ol style="list-style-type: none"> 1. Public life study sponsors and administrators may be concerned with the quality of data that is collected by the surveyors. 2. People who participate in a study may be concerned with the difficulty or complexity of their surveying task 3. People who use public space may be concerned that they will not like changes that come after a study is conducted. <p>We address the concerns as follows:</p> <ol style="list-style-type: none"> 1. As a digital data collection tool, CommonSpace improves on existing methods of data collection (paper based) through a consistent data collection workflow and standardized fields. Further, by eliminating the lag between data

		<p>capture and data availability (as data no longer needs to be transcribed), CommonSpace makes it possible for study administrators to more quickly review collected data and identify any potential issues.</p> <ol style="list-style-type: none"> 2. The CommonSpace prototype is designed to make public life studies easier, through an easy to use digital tool. Concerns about the difficulty or complexity of the surveying task will be addressed through UX design and reviewed through gathering user feedback from the field test. 3. Concerns that a given public life study may result in changes in a public space that is not desired will be mitigated in the launched version of the app by building a feature that supports data publication, and by Sidewalk Labs encouraging study organizers to make their data publicly accessible for others to use and analyze. Sidewalk Labs will make any public life study data that we collect publicly accessible in the future.
<p>Is there appropriate Notice, Consent and Control as part of the data collection and use?</p>		<p>Yes. Study organizers and surveyors - the users of the app - are guided through a series of onboarding screens that notify them that the purpose of the app is data collection, that they provide their email address for the purposes of assigning them a study, and of the identity of the study administrator who receives the data they are collecting.</p>
<p>DECISION</p>		

<p>After considering all the above factors, is the activity a “go”, “no go”, or should some aspect of the activity be recalibrated to reduce the residual risk?</p>		<p>After considering all the above factors, Sidewalk Labs deems this project to have benefits for decision making that outweigh the potential risks of bias or other identified risks, and will proceed with the development of CommonSpace and the field test.</p> <p>NOTE: under Sidewalk’s digital governance proposal for Quayside, the Civic Data Trust would be the entity making this analysis and decision.</p>
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