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The Census and future provision of population statistics in England and Wales

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This letter represents the Runnymede Trust's response to the consultation of the future Census. Runnymede is the UK's leading independent race equality think tank. Runnymede is working to build a Britain in which all citizens and communities feel valued, enjoy equal opportunities, lead fulfilling lives, and share a common sense of belonging.

In order to effectively overcome racial inequality in our society, we believe that our democratic dialogue, policy, and practice, should all be based on reliable evidence from rigorous research and thorough analysis. We welcome this opportunity to respond to a consultation on adapting the Census, not least given its important role in helping Runnymede realise its ambitious vision.

Outline and summary of response

1) In this response we first indicate some general thoughts and concerns in the introduction. We then separately evaluate the two preferred options in separate sections, in which we also highlight some examples of research and policy that would likely be difficult on one of these options, and also suggest opportunities for learning from existing surveys and policy. In the final section we suggest some implications for policy and democracy, especially if data on ethnicity is not robustly captured at a local level.

2) In summary, we are not convinced that either option is optimal. Despite the decreasing reliability over ten years and the real promise of administrative data, we are somewhat more satisfied with the decennial online option given the significant quality assurance, legislative and privacy challenges for the administrative data option. We base this in large part on our understanding of the Beyond 2011 Independent Working Group and the Independent Review of Methodology led by Chris Skinner.

3) More specifically, we are not convinced that the administrative option will allow us to get good enough local area data, and in particular to understand population change over time, on grounds of ethnicity. Nor will it allow us to provide 'interaction' datasets (e.g. migration and commuting), and

understand such important issues as the debates on segregation.¹ This lack of understanding is likely to lead to less policy focus on racial disadvantage, and less ability to design and evaluate policies that do seek to address continuing racial disadvantage. And as the ethnic minority population grows, failure to address these issues will increasingly be a challenge to Britain's democratic legitimacy.

Introduction

4) We welcome the opportunity to respond to the ONS consultation on the Census as it is a research and statistics tool that Runnymede has historically drawn on to assist us with our work on addressing the inequalities experienced by minority ethnic groups across the UK. We have recognized the importance of good statistics on ethnicity since our founding (having published an estimate of the ethnic minority population in 1973), and called for the ethnicity question to be added to the Census throughout the 1970s and 1980s.² Without understanding the reality of racial disadvantage in the UK, policymakers are acting blindly if they choose to seek solutions to that disadvantage.

5) As the 2011 Census tells us, there are now nearly 8 million Black and minority ethnic people in the UK (nearly matching the combined population of Scotland and Wales), compared to just over 3 million in 1991 and 4.6 million in 2001. Since the ethnicity question was included in 1991, the Census has provided us with the data and information on local and national population changes to enable us to match the particular issues affecting ethnic minorities with their representation within the population, as well as to identify change over time on a variety of social indicators, including how experiences vary among ethnic groups at a local area level.

6) Below we outline some of the most pertinent issues we think are likely to impact our continued ability to do this work. These comments are in addition to those raised in the consultation response made by the Equality and Diversity Forum of which Runnymede is an active member, and by the Independent Working Group on Beyond 2011, to whom we defer on technical evaluations of the two preferred options.

7) Before commenting on these two options, we feel obligated to note that lack of data is often used as a reason not to respond to social policy issues, or to suggest that there is no good way to evaluate policy interventions absent such data. We do not believe that collecting data in itself will result in actions to eliminate racial disadvantage, but over the years we have found that Census data can indeed be one driver of policy attention, while those countries that do not have good data on ethnicity are even more hampered in trying to respond to racial disadvantage and community cohesion.

¹ We understand that the important evidence in the briefing 'More segregation or more mixing?' would not be possible with administrative data. See <http://www.ethnicity.ac.uk/census/>

² Lomas. G. B. Gillian. *Census 1971: The Coloured Population of Great Britain* (London: Runnymede Trust 1973). The *Runnymede Bulletin* has many stories on the need for an ethnicity question throughout the 1970s and 1980s.

8) In our experience, civil servants, politicians, journalists and indeed the wider public are often surprised by the extent of racial inequalities evidenced in Censuses, while our ability to chart change over time often contradicts received wisdom about, e.g., segregation. There are of course important and significant technical and methodological questions for the Census, but it is also worth highlighting how the resultant data requires policymakers and the public to face the reality of social change and ethnic disadvantage, and, occasionally, to consider appropriate solutions that may actually overcome such disadvantage. While we appreciate ONS must not base the Census solely on policy considerations, we believe more focus should be placed on the value of the Census as a tool to identify and design policies to respond to social issues, including racial disadvantage.

The online census option

9) We first comment on the first of the two proposals to replace the Census in its current form: to continue with a 10 yearly Census but conducted online. As indicated below, we are keen to continue the decennial Census as has been the norm since its establishment in 1841. We appreciate that decennial censuses result in data being decreasingly accurate between Censuses (and we were still using 2001 data in reports published in 2012), especially where immigration or other factors lead to significant change, but on balance believe this option should be preferred.

10) We do, however, have concerns about the known risks associated with a move to an online facility. Broadly we are concerned that those with limited access to computers, for example those living in poverty or the elderly, would need a greater level of support to facilitate inputting their information. It is well known that there are some minority ethnic communities who are highly represented not just in areas of high deprivation but living in poverty, particularly those from Bangladeshi and Pakistani backgrounds and refugees from Black and minority ethnic backgrounds. And while we anticipate that some migrant groups may be more likely to use online services to stay in contact with family and friends (including remittances and Skype), they may not access these at home, or be unwilling to fill in Census forms online, or may have language difficulties in doing so. Usage of online services to stay in touch with family and friends may not be a good predictor of willingness to use an online option to input personal data to the government.

10) While there is of course computer ownership among individuals from the aforementioned communities, and while online access via a variety of devices is likely to increase broadly across income groups, we should not overestimate the extent to which this will occur uniformly for these individuals and families. We therefore anticipate that access issues will need addressing to guard against a disproportionately poor response rate within these groups.

11) Furthermore, while there will continue to be use of paper forms under the online option where they are specifically requested by individuals, given historical evidence of low response rates from poorer, minority ethnic and older

individuals under the existing system³, we would recommend specific targeting of vulnerable groups based on what is known about local populations. Increasing use of local community based support networks, for example drawing on the assistance of community centres, schools or local hubs, would certainly assist these groups in completion of their online forms (and was a key strategy for the 2011 Census).

12) Movement towards conducting a primarily online census would likely facilitate easier use for those for whom English is not their first language, removing the time it takes to request and receive translated postal forms (assuming that respondents will be able to navigate and choose their particular language preference online).

13) Our final point with regards to the online form option relates to the information given to the general public about the change to the Census as well as the importance of submitting information. Online options are likely to have somewhat different non-completion rates than the existing Census (i.e. better among some populations, but worse among others). In addition to international examples, there may be lessons to learn from the implementation of Individual Electoral Registration (IER), not least given the prominence to online registration, but also the known increase in ethnic minority undercounting that IER is expected to result in (and which the Cabinet Office is expected to seek to counteract).

14) We would stress the importance of clearly sharing information to the public about the change from paper to online form, ensuring the tone of publicity is appropriate (with less focus on the threat of fines) and sensitive. Many minority ethnic, migrant, asylum seeking and refugee communities already feel under heightened forms of surveillance, specifically in view of their migrant/refugee status and/or ethnicity. Some also come from countries where counting minority groups has been a way for oppressive governments to target those populations.

15) This experience will no doubt impact upon some individual's readiness to submit personal information about themselves. Anxiety about the use to which information they have submitted means that clarity about anonymity, security and the use of data should be emphasised in publicity, wording and training for those who may support them with their forms. There are likely also lessons to be learned from other surveys with a significant ethnic minority boost, such as *Understanding Society*.

The administrative data and survey option

16) In this section we address the second proposed option put forward by ONS – to cease the decennial census and move towards annual outputs based on

³ For the 2011 Census, coverage was judged to undercount the following groups, in descending order of importance: 1. renting privately; 2. where the occupants are of Black, Asian, Chinese or Mixed ethnic group; 3. paying part rent/part mortgage; 4. containing a single person; and; 5. where the average age of the people within the household is between 23 and 34. 2011 UK Census Coverage Assessment and Adjustment Methodology: <http://www.ons.gov.uk/ons/guide-method/census/2011/the-2011-census/processing-the-information/statistical-methodology/coverage-assessment-guide.pdf>

the use of administrative data, supported by an annual survey collected from 4% of the population. The proposed administrative data includes annual school censuses; NHS Patient Register; Higher Education Statistics Agency (HESA) data; Department for Work and Pensions and HM Revenue and Customs Customer Information. The ability to draw on data more regularly in this way would indeed ensure that analysis is more up to date than that provided by the existing census and is a clear advantage. The use of administrative data would not however in our view provide sufficient levels of data about ethnic groups or any other small population groups (including those broken down by disability). In addition many sample surveys and administrative data sources depend on the current Census to enable adjustment against population totals for non-response and weighting (and so the increased frequency of sampling may not compensate for not having a baseline after the 2011 Census).

17) A significant difficulty for the use of administrative data for accessing information about minority ethnic groups is the inconsistency of the data held by different government organisations. Recent work conducted by Runnymede in association with the TUC based on Freedom of Information requests to a range of public sector bodies found wide inconsistency in the data collected and submitted by different organisations about their Black and minority ethnic workforce.⁴ This made comparative analysis difficult and in some cases impossible. Furthermore, data collected by different government agencies is done so in order to provide a specific function⁵ and thus will not pick up all the characteristics of an individual. In the past we have often found that existing administrative data (for example financial institutions' data about who they lend to) is inadequate to understand an issue or design appropriate solutions. We would be deeply concerned that consistency in the collection (and categorization) of information about ethnicity would be a casualty of a reliance on this data.

18) There is also increasing concern that detailed information about very small areas will no longer be available. The 2011 census showed that not only were minority ethnic and migrant groups growing in size, but that this was occurring across the UK. Where very small numbers of individuals from particular BME groups may be resident in non-urban localities, it is less likely that the use of administrative data would pick up these groups. It is essential to know the local distribution of small population groups with specific cultural and language needs so that services can be targeted effectively. We agree with the view expressed by the Beyond 2011 Independent Working Group that communities require more, rather than less locally based statistics in view of the ongoing changes to local service management under the current financial climate.

19) At Runnymede we rely heavily on accurate data that can show where minority ethnic groups live and their variable educational, employment and income outcomes in order to make well evidenced statements on how local and national policy is likely to affect them. The Census also enables a wide range

⁴ Weekes-Bernard, D. (forthcoming 2014) *In this Together? How public sector cuts are affecting Black and minority ethnic workers* (London: Runnymede and TUC)

⁵ Platt, L. (forthcoming 2014) 'Can we do without the census' in Runnymede Perspectives Paper, ed. O. Nwabuzo and C. Alexander (London: Runnymede)

of researchers, many of whom we work with as part of our Academic Forum, to make predictions about future population density broken down by ethnicity (we are due to publish a volume of ten collected essays on this topic in early 2014).⁶

20) Indeed our recent analysis, conducted with the Centre on Dynamics of Ethnicity at the University of Manchester, of the location of BME groups in areas of high deprivation⁷, drew heavily on Census information and could not be replicated in the future were we to move to a system of collecting population statistics based on administrative data. This briefing showed that the impact of where you live – and in particular employment disadvantage – varies significantly by ethnic group. This has implications for ‘integration’ or ‘cohesion’ policy or for understanding population movement (as the findings suggest moving to a better off area may not be so beneficial for some ethnic minority groups), but also for employment policy, as it indicates that certain areas and ethnic groups need targeting in order to reduce unemployment and poverty.

21) The main source of these difficulties for administrative data is the 4% annual population survey. Again, others have commented on the legislative, technical and privacy challenges for the survey, but here we simply note that 4% is too small to analyse many ethnic minority groups at a local level: the confidence intervals will be too large and many more findings will not be statistically significant. For examples of why this is the case – from the provision of burial grounds to the provision of health care needs among young ethnic minorities to the estimate of the number of older Muslims living in Dewsbury – see the work of Nissa Finney and Ludi Simpson.⁸ In many cases a 4% sample will mean that we will be confident that our population estimates are within a 40% band from the survey’s finding – hardly good in statistical terms, and worse still when such figures would be used to design, implement and evaluate policy.

Data, policy and democracy

22) This leads us to our last points, namely that whatever decision ONS makes will have a significant impact on policy and democracy. Effective data not only results in people understanding or learning about a problem, but also allows the public to demand politicians do something about it, and policymakers to design, implement and then evaluate whether that something was actually effective.

23) It is, of course, too bald to say that administrative data will not allow Britain to effectively respond to health, transport, employment, or wider economic and environmental issues. But it is clear that ethnic minorities will be particularly ill served in all of these social policy domains where local level data is inadequate to be confident of the size and nature of existing populations.

⁶ Nwabuzo, O & Alexander, C (eds) (forthcoming 2014). London: Runnymede Trust.

⁷ Jivraj, S & Khan, O (forthcoming 17 December 2013) “Ethnicity and Deprivation in England: How likely are ethnic minorities to live in deprived neighbourhoods?”, *The Dynamics of Diversity: Evidence from the 2011 Census*, CoDE, University of Manchester. Draft version attached in email.

⁸ A powerpoint summary is available here: http://www.rgs.org/NR/rdonlyres/089EFE4C-EE74-41B0-8504-5BED9840D6F9/0/FinneySimpson_Beyond2011FutureOfSmallAreaStatistics_Ethnicity_181013.pdf

24) Another example of Runnymede research that would not be viable with administrative data is our report on cashpoint location, *Who Pays to Access Cash?*. This report used the Index of Multiple Deprivation and information about the postcode location of each of the roughly 60,000 cashpoints in the UK. We found that ethnically diverse areas were *less* likely to have a free cashpoint regardless of an area's level of deprivation. Even better off diverse areas had worse access to cash than the more deprived areas where few ethnic minorities lived. Another report we are about to undertake will similarly use the IMD to show that ethnic inequalities in local areas are often much larger in better off neighbourhoods, again suggesting that deprivation is not the only explanation for ethnic disadvantage in Britain. Both of these reports suggest that ethnic disadvantage cannot be explained wholly in terms of where people live but also that policies must target diverse areas as well as deprived ones, a conclusion that would have less purchase absent the local area evidence to back it up.

25) Another research finding that we believe is relevant for the Census is the increasing dispersal of the Black and minority ethnic population. We have already cited the CoDE briefing on segregation and mixing, but another important finding emerges in Leeds research summarized in Wohland et al.⁹ This suggests that over the next few decades the ethnic minority population will become much less concentrated in urban areas, especially London. Whereas the population of White people living in rural areas will barely change, from 32% in the 2001 Census to 34% in 2051, the researchers suggest the comparable rural 2051 figures are 20% for Asian people (from 12% in 2001), 20% for Black people (from only 8%) and 21% for Chinese people (from 17%), with a comparable shift away from London.

26) This is relevant because it is likely to increase the number of areas where the 4% sample will be unable to provide good enough data for ethnic minority groups. It is unsatisfactory that we would not be able to chart this important kind of change over time, not least as it will comprise an increasing share and increasing number of ethnic minorities. Over time, as these populations increase, we may be able to say more about the social characteristics of those moving to rural areas or out of London (such as whether they are better off), but this is likely to take a number of decades until the 4% survey will be reliable enough to do so.

27) Our final point concerns how the Census options will influence policy in British democracy. We have already given examples of where a 4% sample survey will be unable to capture the health or education needs of ethnic minority groups, a possibility that raises concerns not simply about the efficacy of policy, but the ability of policymakers to respond equally to the needs of all citizens.

28) It is of course not the responsibility of ONS to respond effectively to ethnic inequalities and ethnic disadvantage. However, without an adequate Census,

⁹ Wohland, P. et. al. (2010) 'Ethnic Population Projections for the UK and Local Areas, 2001–2051'. Working Paper 10/02. School of Geography, University of Leeds. http://www.ethpop.org/Publications/wp_eth_pop_projections.Pdf

researchers will be unable to explain the nature of the ethnic minority population of the UK to the wider public. Yet at present public opinion is particularly ill-informed about the numbers of immigrants or Muslims living in the country. While we appreciate that both options will allow for accurate headline figures, local level information often resonates better and is more meaningful to citizens and politicians. And if policymakers do not understand the nature of the ethnic minority population in an adequately fine-grained manner, they will be unable to respond to genuine needs in education, healthcare, transport, employment and indeed economic growth and environmental sustainability. As we have already indicated, this suggests a challenge for British democracy, whereby the needs of minority groups are not fully understood, nor are they included in the decisions of policymakers.

29) We remain open to both Census options, but understand that there are significant barriers to realising the promise of administrative data. It is possible that if some of these challenges are overcome in time for the 2031 Census that this make administrative data a better option by that point. For now, however, we believe the online option is more likely to accurately capture and lead policymakers and service delivery better to consider the needs of ethnic minority groups (despite the increasing inaccuracy between censuses). It is reasonable to judge data by the extent to which it capture small populations, especially where those populations have particular experiences and needs, just as it is reasonable to judge a democracy by the extent to which it responds to the needs of minorities, particularly where those minorities continue to be disadvantaged.

We appreciate the opportunity to respond to this important consultation. Please contact us for any further questions.

Yours sincerely,

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