



**PAVEE POINT**  
TRAVELLER AND ROMA CENTRE

**Submission to the Central Statistics Office (CSO)**

# ‘Towards an Ethnic Equality Question in Census 2021’

**Including a focus on:**

- The development of the ethnic equality question
- The under-enumeration of Travellers
- The omission of the Roma
- Data compatibility within and outside Ireland
- Practical proposals

‘If we are not counted – we do not count’

**Pavee Point Traveller and Roma Centre October 2017**



'All Departments and Agencies will explore the development of a system for capturing data on the participation of Travellers and Roma (as well as other minority ethnic groups) across all Government Departments and statutory agencies in all thematic areas and actions within their remit'  
National Traveller and Roma Inclusion Strategy 2017-2021

The most important overall recommendation in this submission is that the revised ethnic origin question in Census 2021 should be firmly located and explained as an ethnic equality question.

This submission seeks to complement and bring added value to the Pavee Point Report 'Policy and Practice in Ethnic Data Collection and Monitoring' (2017).



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# 1. Executive Summary and Key Recommendations

**The Central Statistics Office (CSO) in Ireland has indicated that it will undertake a review of the ethnic and cultural background question in preparation for the design of the Census 2021. The ethnic and cultural question was first posed as Question 14 in Census 2006 and subsequently as Question 11 in Census 2011 and Census 2016 (hereafter Q14/11). We welcome this consultation which is consistent with previous positive engagement with the CSO and Traveller groups (Section Two)**

Pavee Point Traveller and Roma Centre (hereafter Pavee Point) acknowledges the time, cost (including human resource cost) that is necessary to amend the Census and important changes are not an easy undertaking for the CSO. However we believe that the recommendations in this report will significantly improve on the existing Q14/11 and assist in the promotion of equality for all in Ireland, including in particular existing and relatively new and emerging minority ethnic communities in Ireland. (Section 2)

Pavee Point has a dual role and expertise. While the main focus of our role and work is with Irish Travellers and Roma and the international Roma community in Ireland, Pavee Point has also been at the forefront of promoting ethnic equality data collection and monitoring at both a national policy level within Ireland and at a European/UN level. (Section 2)

This report provides a discussion and rationale for developing an explicit rather than an implicit ethnic equality approach to Census 2021 and discusses how the existing question format can be evolved. Specific recommendations are made on the basis of this discussion. (Section 3)

The problems of the omission of a full ethnic equality question and the weaknesses in approach to data collection prior to Census 2006 are briefly summarised as a further rationale for the ethnic equality approach advocated in this report. (Section 4)

The legal underpinning of the Census is explained for context and for the assistance to general readers of this submission, but also to flag where amendments may have to be made. (Section 5)

Despite the positive efforts of the CSO working with Pavee Point, 'hard to reach' groups such as Travellers continue to remain under enumerated in the Census to date. Pavee Point is willing to assist in the greater inclusion of Travellers and Roma Census 2021. Additional resources for this should be sought by the CSO for this purpose. (Section 6)

Roma must be included as a disaggregated category within Census 2021 as they are a community that experiences among the highest levels of inequality in Europe. This would also support in reporting to the EU Framework for the implementation of Roma Integration Strategies. (Section 6)

State Agencies should adopt the Census question and associated ethnic categories for the purposes of ethnic equality. Past failures to do this have resulted in negative public discourse. While this is a Government role, the CSO have an important expertise and advisory role. (Section 7)

It is important that the ethnic equality question in Census 2021 can be compared with other countries/jurisdictions especially on an all-Ireland basis. (Section 8)

Recent standards and good practice in Europe provide a solid conceptual underpinning of the recommendations in this report, including in respect of Travellers and Roma. (Section 9)

A summary of the rationale for the changes proposed in this report are highlighted. These draw on previous sections of this report. A proposal for the ethnic equality question is set out. (Section 10)

## Summary of Key Recommendations for Census 2021

The key recommendations drawn from this submission from Pavee Point are as follows:

- 1** The section in the Census should be re-named and explained as the ‘ethnic equality question’ and the actual question should be shortened ‘What is your ethnic background?’ These changes should also be reflected in a new Statutory Instrument that will be required for Census 2021
- 2** Pavee Point and other key stakeholders should be consulted about proposed changes to Census 2021 as the review and refinement of the revised ethnic equality question progresses, including at the pilot stage
- 3** The revised question should represent an evolution and expansion, and not a complete break, from the existing ethnic origin question
- 4** In the 2016 Census, the ethnic group question was grouped together with questions on nationality and religion. This is a positive development consistent with international good practice and this approach should be continued in Census 2021
- 5** The continued under enumeration of Irish Travellers and the omission of Roma in Census 2016 and before, should be redressed as a priority in the lead up to Census 2021. We recommend that this under enumeration of Irish Travellers and the omission of Roma is identified as an additional resource requirement by the CSO
- 6** Consideration should be given to additional categories being added to the Census question on ethnic equality, including primary categories and disaggregated categories. Suggestions are made in final section of this submission based on an ethnic equality approach
- 7** The proposed ethnic equality question must be fully explained. A paper should be published by the CSO outlining all the proposed changes to Census 2021, including the rationale and revised format of the 2021 ethnic equality question. This paper should in turn inform the advisory notes for respondents and concomitant training for Census enumerators
- 8** Government agencies/national surveys seeking to capture ethnic equality data should be required to follow the format in Census 2016 with immediate effect, and Census 2021 once changes have been agreed. This would avoid future mistakes and the creation of unnecessary sensitivities; would save public funding and would ensure the data collected on a national and administrative basis is consistent with and can be compared with the national Census. While this is also an issue for Government, the CSO could play an important role in advising/highlighting the benefits of a consistent approach
- 9** The development of strategies to ensure that there is clear understanding about the rationale, collection and analysis of ethnic equality data within state agencies. While this may be an issue for government, the CSO could assist in shaping and mainstreaming such an approach, building on progress to date
- 10** The gaps and weaknesses in the Census prior to 2006, when there was no ethnicity question are still relevant, and should continue to inform the 2021 ethnic equality question. These gaps could be highlighted as part of the rationale for an ethnic equality question in Census 2021
- 11** The format of the proposed 2021 ethnic equality question should remain compatible with the format in the UK Census to continue to facilitate on going comparison of data, including on an all-Ireland basis
- 12** The CSO could play an important role in striving for European Consensus on an agreed approach to the inclusion of an agreed ethnic equality question in the Census of the EU28

# Current Census Ethnic Question

What is your ethnic or cultural background?

Choose ONE section from A to D then ✓ the appropriate box.

<b>A</b>	<b>White</b>
	<input type="checkbox"/> Irish
	<input type="checkbox"/> Irish Traveller
	<input type="checkbox"/> Any other White Background
<b>B</b>	<b>Black or Black Irish</b>
	<input type="checkbox"/> African
	<input type="checkbox"/> Any other Black Background
<b>C</b>	<b>Asian or Asian Irish</b>
	<input type="checkbox"/> Chinese
	<input type="checkbox"/> Any other Asian background
<b>D</b>	<b>Other, Including Mixed background</b>
	<input type="checkbox"/> Other, write in description:



## 2. The Review Process and Pavee Point

**The forthcoming review of Q14/11 is welcomed in principle by Pavee Point, as is the commitment by the CSO to consult with key stakeholders about possible forthcoming changes. This consultation continues the positive interaction between Pavee Point and the CSO over many years and which was acknowledged in the explanatory note for Census 2006. 'CSO' (2006)**

Pavee Point agrees that a review of Q14/11 in preparation for the 2021 Census is now desirable and necessary and welcomes the additional resource indicated that would be made available for this change. Further, we would recommend that an overall review of the Census is undertaken to strengthen the potential of all emerging data to address all forms of inequality in Ireland.

Pavee Point looks forward to working with the CSO to revise the question based on national and international good practice, guidance and legislation and which also takes into account the broader public policy context and specificities of ethnic diversity and inequality in Ireland.

Pavee Point wishes to highlight the on-going challenge of the under-enumeration of Travellers and the continued omission of the Roma community in Ireland, which should be redressed as priorities in Census 2021.

Pavee Point acknowledges the time, cost (including human resource cost) that is necessary to amend the Census and important changes are not an easy undertaking for the CSO. However we believe that the recommendations in this report will significantly improve on the existing Q14/11 and will significantly assist in the promotion of equality for all in Ireland, including existing and relatively new and emerging minority ethnic communities in Ireland.

### The Experience and Expertise of Pavee Point

Pavee Point has a dual interest in the revision of Q14/11. While the main focus of our role and work is with Irish Travellers and Roma and the international Roma community in Ireland, Pavee Point has also been at the forefront of promoting ethnic equality data at both a national policy level within Ireland and at a European/UN level.

### Conclusions

- Pavee Point and other key stakeholders should be consulted about proposed changes to Census 2021 as the review and refinement of the revised ethnic equality question progresses (including after the piloting stage of the question).
- Pavee Point has recognised expertise in ethnic equality data collection and monitoring at both national and international levels.

### 3. Ethnicity and the Census Question: A discussion and rationale for developing the existing format.

**This section aims to provide an accessible and broad ranging discussion of the misunderstandings that can lead to sensitivities about the inclusion of an ethnicity question. Further this discussion includes a focus on some of the specificities of ethnic diversity in Ireland that have direct relevance to the development of a more comprehensive and better understood ethnic equality question in Census 2021.**

There are a wide range of common misunderstandings about ethnicity in general in Ireland that can on occasion lead to sensitivities and negative public discourse. While the present ethnic question in the Census has in general proven robust these misunderstandings may also have contributed to some negative discourse on Census question 14/11. It is also important to be aware that the history of ethnic diversity, inequality and racism varies from one country to another and the specificity of this experience in turn contributes to the sensitivities towards a question about ethnicity.

One of the most common misunderstandings about ethnicity is that ethnic groups in Ireland are only comprised of foreign born and/or not White people.

#### Black Irish

**A person's ethnicity is never only based upon the colour of skin. Black people, for example, can be from a Caribbean, American or Sub Saharan African ethnic group. Indeed, it is possible for Black Africans in Ireland to define their ethnicity through a wide and complex reference to customs, religious beliefs, language, national, regional, local and tribal identities. The full breadth of this complexity will never be fully covered in a Census, and nor should they be. These are issues for broader sociological, political and anthropological inquiry.**

The central theme of this submission is that the Census needs to focus on the key data that is essential for the future inclusion and progress of minority ethnic groups in public services and more generally to ensure that Census data contributes to ethnic equality at both a national and administrative level within Ireland.

While ethnicity is never simply based upon skin colour, it is also important to note that many Black people will self-declare their ethnicity as being Black-American, Black-Irish or Black-African for example. The omission of 'Black' categories in an ethnicity question in Census 2021 would likely be met with opposition and suspicion as it would appear to be a reversion back to the pre-Census 2006 (see section 4 of this report).

Conversely there are some observers who are concerned that the present Q14/11 are primarily 'racial' rather than ethnic categorisations. There clearly needs to be further public awareness by the CSO to highlight that the purpose of this question is for ethnic equality. The categories should largely reflect the basis on which ethnic groups experience inequality in Ireland. Categories, particularly new categories, should be tested in a pilot survey and through consultation prior to Census 2021.

A further common misunderstanding in public discourse is that it is often presumed that Black people in Ireland are recent migrants and are in Ireland because they are asylum seekers or refugees, or undocumented workers or immigrants. There is a lack of appreciation in this discourse that Black people may have lived in Ireland for generations and when someone asks 'where are you from originally?' the answer may be 'Dublin' or 'Cork' rather than 'Lagos' or 'Freetown'. This is why Q14/11 in the Irish Census provides for people describing themselves as Black Irish. It is also evident that those that seek to discriminate against Black people will not likely make the distinction about whether they are from Ireland or not or what their actual legal status is in Ireland.



## Sub-Saharan and Arab proposed separate categories

**From Pavee Point's interaction with Black and Minority Ethnic Groups and through emerging good practice in other countries, it is proposed in this submission that Census 2021 should include the additional categories of 'Sub-Saharan' and 'Arab'.**

According to the United Nations, Sub-Saharan Africa consists of all African countries that are fully or partially located south of the Sahara. It contrasts with North Africa, whose territories are part of the League of Arab states within the Arab world. These and other countries in the Arab world outside of Africa should now be covered by a new 'Arab' category in the 2021 Census.

## Roma category

**Another important element of ethnicity, (for example Irish Travellers and Roma) is continuity in time, that is, ethnic groups have a long shared history and a future as a people, with traditions and culture passed down over generations. In recognising this continuity in time, it is also important to recognise that culture and custom are not static concepts and will change and evolve, whereas outmoded notions of race and/or the presumption that ethnicity are static and fixed concepts are both incorrect and will often be perceived as racist.**

Reliable and comparable equality data are important to design effective legislation and policies and put in place real solutions. For example, if we do not know how many Roma children are enrolled in education, we cannot begin to address segregation or the non-attendance of Roma children in schools in Ireland. 'If we are not counted – we do not count' (ENAR, 2016)

## Eastern European category

**People from Eastern European countries now constitute a significant minority community in Ireland.**

While they are of course a very diverse community it would be useful to consult with representative groups, including for example from Poland and the Baltic States, to consider if an additional 'Eastern European' category should be included in the Census. This is again on the basis of an ethnic equality approach. It is evidence from human rights and migrant bodies that people from Eastern Europe do experience discrimination and racism in Ireland.

## Jews and Muslims

**Jews are a long established ethnic group in Ireland. While the first Jews in Ireland can be traced back 1000 years, the largest increase in the Jewish community in Ireland can be traced to inward migration, principally from Lithuania in the mid-late 19th century. The largest number of Jews in Ireland (3,907) was in 1946. By 2016 the Jewish population had fallen to 2,557 mainly through post war and continuing emigration. However it should also be noted that the Jewish population in Ireland actually grew by 28.9% between 2011 and 2016. This is by far the largest increase in over a century indicating a significant revival of the Jewish community in Ireland. While it is widely acknowledged that the history of anti-Semitism in Ireland has not been as virulent as many other European countries, there is evidence of its continued existence.**

A separate category for Jews did not appear in recent Census forms either under the religion (Q12) question or as part of Question 11 in Census 2016. The omission from the Census has understandably raised sensitivities within the Jewish community in Ireland,

‘ Jewish leaders have expressed concerns that the upcoming census may not accurately record the growing number of Jews living in the Republic. While there has been a noticeable influx of Jews since the last census in 2002, they say that the lack of a separate “Jewish” box under the census form’s religion question could mean that some of the newcomers remain statistically invisible’.

‘Irish Times’ (31 March 2006)

However if it was understood and agreed that one of the objectives of the overall Census was concerned with ensuring ethnic equality, there would no debate that Jews should be specifically recognised in the Census, both because of the reality of anti-Semitism, but also because of the historical and contemporary importance of the Jewish community in Ireland and indicative of a recent and welcome revival in numbers.

A Jewish category must be available in the Census 2021 and the Jewish community should be consulted about whether the category should be included in the religion or ethnic equality section of the Census. From a pragmatic perspective, it would probably make best sense emuneration occurs in the religion section as the existence of one ethnic/religious community under the revised Q14/11 might appear anomalous to people of other religions who also experience inequalities and racism, including those from the Muslim community in Ireland (who are included as a specific category under Q12 in Census 2016). Islamophobia is of course another one of the dimensions of ethnic inequality that needs to be monitored on a continuous basis.

## ‘Indians, Pakistanis and Bangladeshis’ category

**Indians, Pakistanis and Bangladeshis in Ireland identify with different religious and linguistic groups.**

Again, the extent of complexity in relation to the ethnicity of people even within India, Pakistan or Bangladesh is going to be very diverse and is never going to be fully captured within a Census. There are of course significant political divisions and sometimes tensions between minority ethnic groups and countries within this region of the world. However, these communities are growing in Ireland and they do experience discrimination and other forms of ethnic inequality. This submission proposes their inclusion under the ‘Asian or Asian Irish’ category as the only other specific category in this section is ‘Chinese’ which may be one of the factors that some argue that the Census headings are ‘too racialised’.

## Mixed ethnic background

Mixed ethnic background is particularly difficult to capture within the Census but is an increasing reality in Ireland. As the number and range of ethnic groups increases, so does the possibility of inter-marriage. Adoption is a further complexity, and adopted children in Ireland may be of a different ethnic group than that of their adopted parents. It is crucial that the Census seeks to take into account that a person may choose to hold, for example, a Chinese based ethnic identity even though he/she was born in Ireland and hold beliefs similar to the majority of people who live in Ireland. For many, their ethnicity can be mixed and the person may seek to declare that they are ‘Irish Chinese’ or ‘Chinese Irish’.

## ‘White’ category

**Everyone in Ireland is part of an ethnic group, through there is sometimes a resistance/ sensitivity by those from the majority white population to be considered in this way. As previously discussed when people conceptualise ethnicity they often use a wide range of variables including national identity, religion, language, custom and sometimes including a sense of historical past. This can lead to sensitivities for both for the Census enumerator and for the respondent. However, this sensitivity may be reduced if the rationale for the revised Census question is on the basis of monitoring and supporting ethnic equality (though some people opposed to equality may raise objections). Further, there would likely be significantly more sensitivity created if there was a ‘Black or Black Irish’ category and an ‘Asian or Asian Irish’ category, but no ‘White’ category in Census 2021.**

One key advantage that Ireland has over many other European countries is that we were not occupied by the Nazis during the Second World War. In former occupied European countries there is a residual/ outright distrust about the collection of data related to ethnicity because it was primarily used for the purpose of profiling, oppression and genocide. This should make the development of an ethnic equality question much easier in Ireland (and Britain). However the potential misuse of ethnicity data by rogue elements within every society reminds us of the need to ensure that data protection needs to continue to be at the forefront of all Census data, but particularly in relation to ethnicity. A significant breach of such data could significantly undermine an ethnic equality question in Census 2021.

## Conclusions

- The rationale and format of the revised Ethnic Group Census question for the 2021 Census should be clearly aligned and stated as an ethnic equality question.
- The overall framework of Q14/11 can be retained and further headline and disaggregated categories can be added.
- As part of an ethnic equality approach, the future categories adopted in Census 2021 should take account of the experience and the history of ethnic diversity and inequality in Ireland.
- Additional categories should be added to the Census including primary categories and disaggregated categories. These should include Roma, Arab, People of Sub-Saharan Africa; further disaggregation under the Asian heading. Consideration should be given to the possible inclusion of an ‘Eastern European’ category.
- Jews in Ireland should be specifically included because of the rationale of ethnic equality (and contemporary and future historical inquiry) as opposed to demographic numbers. It is proposed that there should be a separate ‘Jew’ category under the ‘religion’ category, which appeared to be the preference for Jewish leaders in 2006. This would require revised consultation with the Jewish community in Ireland.
- The extent of inequality experienced by the Muslim community in Ireland can already be facilitated as Muslim is already a separate category in the 2016 Census and presumably will also be included in the 2021 Census.
- The changes must be fully explained. A paper should be published by the CSO to explain all the proposed changes to Census 2021 including the rationale and revised format of the 2021 question. Further the aim of the Census to monitor all forms of inequality should be strengthened. This paper should in turn inform the advisory notes for respondents and training for Census enumerators and should be reflected in the statutory Instruments underpinning Census 2021.

## 4. Problems with the Census Prior to 2006

**A review of the format of the Census prior to 2006 highlights the gaps and weaknesses that should not be replicated by potential changes in Census 2021 to Question 14/11.**

### **The invisibility of Black People in Ireland prior to 2006**

**The absence of Black people and other minority ethnic communities in Ireland from the Census before 2006 has significant implications for those communities. Census 2002 only enumerated people by their place of birth, religion, and citizenship, but there was no ethnic and cultural background question, with the exception of stand-alone question on membership of the Travelling Community.**

The statistical absence of Black and minority ethnic groups from the most important demographic and planning instrument in the State until 2006 cannot be redressed retrospectively, but their omission does have profound implications looking back and could have profound implications if excluded from Census 2021.

For example, a recent major review of hate crime in Ireland concluded,

‘The absence of a census question prior to 2006 leaves a silence over the pre-existing populations of people identified as Black or ‘mixed race’ in Ireland...A failure to enumerate this population means the question of ‘blackness’ in Ireland has been interpreted as a recent development and the product of Celtic Tiger immigration’.

‘Critical Perspectives on Crime’ (2017).

### **Irish Travellers**

**The Irish Government’s High Level Group on Traveller issues stated in its first report:**

‘Improved data on Travellers is a key requirement for the future development of policy and monitoring of progress. In particular it will inform the identification of target outcomes across a range of areas – progress against which can be measured over time’.

‘High Level Group on Traveller Issues’ (2006)

The Report noted the first full inclusion of Travellers was in Census 2002 when the question was asked: Are you a member of the Traveller Community? 1. Yes 2. No

While contemporary reports show that Pavee Point approved of the inclusion of Travellers in Census 2002, we also expressed concern that the question (and Travellers) appeared isolated without the inclusion of other ethnic groups and this would likely impact on enumeration.

It should be noted that Census 1996 did collect data on Travellers, but this was compiled by the Census enumerator and not the respondent. It was only on the basis of visual inspection of accommodation, with enumerators ascribing Traveller ethnicity to those households that objectively appeared as 'members of the Travelling community' (CSO, 1998), resulting in a dramatic undercount of Travellers in Ireland. This led the High Level Group on Travellers to urge that any comparison between Census 1996 and 2002, must be treated with caution. 'High Level Group on Traveller Issues' (March 2006).

## Conclusions

The gaps and weaknesses in the Census prior to 2006 are still relevant for the forthcoming ethnic equality question of 2021. The lessons that can be drawn are the invisibility of groups that are not counted; the need to continue to address racism based on skin-colour and the importance of voluntary self identification by the respondent and not the enumerator.

## 5. The Legal underpinning of the Census of Ireland

**The Census of Ireland is governed and informed by a number of key pieces of legislation, including Statutory Instruments, Data Protection legislation and since 2011 by EU regulation. The most relevant legislation is summarised as follows:**

### Statistics Act 1993 and Census Order

**The basic legislation covering the 2016 Census is the Statistics Act, 1993**

Section 25 of the Act enables the Taoiseach (Prime Minister) to make Orders (Statutory Instruments) requiring persons or undertakings to provide information under the Act. The Order can specify the general nature of the information required and the persons required to provide the information. The relevant Order for Census 2016 is the 'Statistics (Census of Population) Order, 2015' which sets out the areas to be covered in Census 2016. A new Order will be needed for Census 2021.

### EU Regulation

**In 2011, for the first time, Ireland along with all other EU countries was obliged to conduct a Census of population.**

This requirement was set out under EU regulation, Regulation (EC) No. 763/2008, which set out the topics to be covered in the 2011 Census in all of the EU's Member States. All EU Member States are due to carry out a Census in 2021.

### Ethnic Equality Data at legislative level within the EU

**There has been an emerging dialogue between Member States around the need for ethnically disaggregated data. However full consensus on an ethnic equality question has not yet been reached at European level. This is in part related to the legacy of the Second World War when data on ethnicity was used for the purposes of persecution of Jews and Roma and other minority groups.**

The European Commission (2000/43/EC) has recognised the critical role of disaggregated data in initiating anti-discrimination policies and increasing its capacity to promote diversity and equality and ensure social cohesion (Open Society Foundations, 2010: 11-12). The Commission continues to stress the need for more specific and reliable information to support EU policies. Directive 2000/43/EC ('Race Equality Directive') explicitly states that Member States should take "adequate measures to promote social dialogue [...] with a view to fostering equal treatment, including through the monitoring of the workplace practices." (International guidance is referenced more fully in Section 8 of this report).

### Government decision

The Government at its meeting of 25th April 2014 decided that a Census of Population should be undertaken in 2016 and that Sunday, 24th April 2016 be set as Census Day. The Government also decided that the questions to be asked in the 2016 Census questionnaire would be the same as those asked in 2011 with the exception of the question on marital status (to take account of the introduction of same-sex civil partnerships in 2011).

## Data Protection

National and European Data Protection legislation requires that:

1. Data must be obtained and processed fairly;
2. Data must be only kept for one or more specified, explicit and lawful purposes;
3. Data can only be used and disclosed in ways compatible with these purposes;
4. Data must be kept safe and secure;
5. Data must be accurate, complete and up-to-date;
6. Data must be adequate, relevant and not excessive;
7. Data can only be retained for no longer than is necessary for the purpose or purposes;
8. Personal data must be made available to an individual, on request.

It should be noted that some EU countries hide behind data protection as an excuse not to collect ethnic equality data because of a misreading/misinterpretation of 'sensitive' data:

‘The current debate in many countries suggest that cost/benefit analysis of the pros and cons of compiling ‘ethnic data comes down on the side of doing nothing. In this context, many countries seem to have a pragmatic strategy which involves, beating a prudent retreat behind their data protection laws’.

‘Ethnic Statistics and Data Protection in the Council of Europe’ (ECRI, 2007)

## Conclusions

- The revised ethnic equality question should be fully included in the relevant Statutory Instruments and Government decisions required for Census 2021.
- The Government should continue to strive for further European Consensus on an agreed approach to the inclusion of an ethnic equality question in the Census of the EU28.
- Because of the abuse of ethnicity data in the past in other European countries, data protection legislation continues to have crucial importance in public confidence in the Census. A major failure could shake or undermine this confidence.

## 6. The under-enumeration of Travellers and the omission of Roma

### Under Enumeration of Travellers

**The under enumeration of Travellers in the Census continues to be a problem. According to Census 2016, there are 30,987 Irish Travellers living in the Republic of Ireland, accounting for approximately 0.7% of the total population. However the 'All Ireland Traveller Health Study' (2010) established the Traveller population at 36,224 in the Republic of Ireland.**

The number of people enumerated as Irish Travellers in Census 2016 was 30,987, an increase of 37% since Census 2006. This increase is attributed to a greater disclosure amongst the Traveller population following collaboration between Pavee Point and the CSO in the inclusion of the ethnic question in Census. In preparation for the 2006 Census, and subsequent censuses, the following Traveller-specific actions were implemented by Pavee Point with the support of CSO:

- Consultation with Pavee Point in the development of census questionnaires;
- Training provided by Pavee Point for census enumerator managers;
- Information and knowledge share;
- Development and dissemination of information DVDs to Travellers (explaining the purpose and benefit of the census and how to complete the form);
- Dedicated website on census fieldwork;
- Liaising and mobilisation of support for census among local Traveller organizations through the provision of awareness raising and training sessions;
- Operation of troubleshooting telephone hotline; and
- Dissemination of census results.



The general need for accurate ethnic equality data on Travellers is emphasised in many places in the 'National Traveller and Roma Inclusion Strategy 2017 – 2021'. For example,

**‘ All Departments and Agencies will explore the development of a system for capturing data on the participation of Travellers and Roma (as well as other minority ethnic groups) across all Government Departments and statutory agencies in all thematic areas and actions within their remit ’**

‘Recommendation 148, p43’

The Census of Ireland should continue to lead the way for the full inclusion and enumeration of Travellers at a national data level.



## The Omission of Roma

Irish Roma and the international Roma community in Ireland are one of the most marginalized communities in Europe, but they remain almost statistically invisible in Ireland, as they do in many other countries. Before and since Census 2006, Pavee Point contended that Roma should be an additional category in the Census. This inclusion can be justified by both the size of the community but more fundamentally from the ethnic inequality perspective that runs as a theme throughout this submission.

The most important strategy for the inclusion of Roma (and Travellers) at an EU level is the European Commission's 'Framework for National Roma Integration Strategies up to 2020' (2011) which stated,

‘ At present, it is difficult to obtain accurate, detailed and complete data on the situation of Roma in the Member States and to identify concrete measures put in place to tackle Roma exclusion and discrimination. It is not possible to assess whether such measures have given the expected results. It is therefore important to collect reliable data’.

At a national level recommendation 149 the 'National Traveller and Roma Inclusion Strategy 2017-2021' (June 2017) stated,

‘ All Departments and agencies will explore the introduction of stratified sampling to gather statistically significant data on Travellers and Roma’.

It is difficult to see how this could be achieved without the inclusion of Roma in the ethnic equality question in Census 2021 as the (a) Census sets out the way ethnic equality data should be collected and (b) data collected by service providers will need to be compared with national data (data aggregation for the purposes of public reporting).

Since 2006 the Roma population in Ireland has fluctuated considerably, this is related to a wide range of factors including for example, changing immigration controls; major economic challenges and difficulties in accessing accommodation in Ireland; factors related to the status and inequalities/ racism experienced by Roma in their country of origin.

In short, it is already the policy of the EU and the Irish Government that Roma are explicitly included in data strategies in Ireland that is going to assist with integration. Combined with the well-documented level of ethnic inequality that is experienced by Roma across Europe, including in Ireland, the continued omission of Roma as a separate category in Census 2021 would appear to be anomalous and counter to stated Government policy.

## Conclusion

Pavee Point understands, more than most, the additional challenges of reaching 'hard to reach' groups such as Travellers and Roma in Ireland and is willing to work on a joint initiative with the CSO to ensure that the 2021 Census more fully enumerates the Irish Traveller community in Ireland and addresses the omission of the Roma community. These challenges should be identified as an additional resource requirement by the CSO.

## 7. The Adoption of an ethnic equality question by State Agencies in Ireland

**The format of the Census question is also crucial as it tends to be the format that is adopted in other national surveys and also by state agencies, including those providing vital services for accommodation, health, education, employment and those linked to the justice and enforcement of justice system.**

Based on the evidence provided in this submission, Pavee Point would contend that the existing framework for Q14/11 has been largely robust and stood the test of time since it was first piloted and then introduced in Census 2006 and repeated in 2011 and 2016. This is reflected in 97.4% response rate to Q14/11 in Census 2016.

Conversely, if the actual and format of the question had not been robust, or if had been brought into disrepute through considerable negative public discourse, it would have been removed or altered at some point over the decade 2006-2016.

The following agencies have adopted the Q14/11 ethnic equality question with the addition of the Roma category in the majority of them. With the exception of the Cystic Fibrosis Registry, the examples are drawn from the statutory/public service sector:

Pobal introduced an ethnic identifier in their Social Inclusion and Community Activation Programme (SICAP) monitoring system in January 2015

The National Drug Treatment Reporting System (NDTRS)

Higher Education Authority (HEA)

Department of Education and Skills (Primary Online Database)

Irish Prison Service

Health Protection Surveillance Centre (HPSC),

Child and Adolescent Mental Health Service (CAMHS)

Cystic Fibrosis Registry of Ireland (CFRI)

Rotunda Hospital [Roma were also included in a pilot initiative]

Pavee Point has worked in partnership with all of these bodies to ensure that data collection is equality proofed and data collectors are equipped with the necessary skills and confidence to monitor and evaluate ethnic equality data within a human rights framework.

### The danger of adopting other ethnic equality question formats

While most government agencies have been guided by the Question 14/11 format when designing their own equality data, this has not always been the case. In 2015, the Department of Education and Skills had to recall an online form that was developed as part of its Primary Online Database (POD). The format of the question offered only one 'Irish' category, which was 'White Irish' and did not include the categories of 'Black Irish' or 'Black African' or Asian Irish. The Department reverted to the Census format following a complaint from an Irish father of two adopted children from Ethiopia. The Department called the mistake 'a genuine error' 'Irish Times' (4 February, 2015).

## Institutional knowledge and ethnic equality data

A further challenge to embedding an ethnic equality approach to data collection by public services is that frequently the rationale and understanding of why and for what purpose such questions are collected is the responsibility of one key expert employee. Once this employee leaves, the institutional knowledge tends to be lost. Strategies must be developed to ensure there is wider understanding within an agency about the purpose and methodology of collecting and analysing ethnic equality data for the purpose of improving outcomes for minority ethnic groups experiencing inequality.

### Conclusions

- Government agencies/national surveys seeking to capture ethnic equality data should be required to follow the format in Census with immediate effect. While this will require broader Government support, the CSO could have a flanking/leadership role in ensuring this happens. This would avoid further embarrassing mistakes and creating unnecessary sensitivities, would save public funding and would ensure the data collected on a national/regional and administrative basis is consistent with the Census.
- The development of strategies to ensure that there is clear understanding about the rationale, collection and analysis of ethnic equality data within state agencies, including training should be a priority.

## 8. The UK approach and compatibility with Ireland

**The UK authorities have had significant experience going back to Census 1991 in the development and revision of ethnic equality data in the Census.**

The rationale for the introduction for the ethnic group question in England and Wales has always been that the question is posed to promote ethnic equality. In a comprehensive review of the ethnicity question undertaken in 2009 for Census 2011 in England and Wales, it was stated,

‘An ethnic group question was first included in the England and Wales census in 1991, with the primary aims of enabling organisations to monitor equal opportunities and anti-discrimination policies and to allocate government resources more effectively.’

‘Final recommended questions for the 2011 Census in England and Wales.  
Ethnic group (October 2009)

This contrasts with the much weaker rationale provided in the guidance notes to Question 14 in Ireland’s Census 2006, 2011 and 2016 which merely states,

‘Coupled with information from other questions on the form, the responses will facilitate a comparison of the demographic and socio-economic characteristics of the different ethnic and cultural groups living in Ireland’.

Census of Ireland (2006, 2011 and 2014)

In preparation for the 2011 changes to the Ethnic Group question, The England and Wales Census undertook a survey and were asked whether they found the ethnic group terminology used in the 2007 Census Test clear, understandable and acceptable. The majority of respondents (70 percent) thought the categories of ‘White’, ‘Mixed’, ‘Black or Black British’, ‘Asian or Asian British’ and ‘Other ethnic group’ were acceptable. Final recommended questions for the 2011 Census in England and Wales. Ethnic group, p16 (October 2009)

It should be noted that Question 14/11 was influenced by the longer experience in England and Wales on capturing ethnicity data and it allows for direct comparison between the UK and Ireland as the format of the question in Scotland and Northern Ireland are similar.

In 2011 the CSO and its equivalent in NI (NISRA) published the first joint report on census data from both jurisdictions ‘Census 2011, Ireland and Northern Ireland’ (June 2014). The similar format of the ethnicity question allowed for direct comparisons that were not possible in other aspects of the Census. For example, the format of the socio-economic questions are different.

### Recommendations

- The format of the 2021 Ethnic Group Question should remain compatible with the format in the UK Census to facilitate on going comparison of data on an all-Ireland basis.
- The CSO should consider raising the approach to an ethnic equality question as part of the bi-lateral meetings between Ireland, England and Wales; Scotland and Northern Ireland.

## 9. The promotion of ethnic equality at a European and UN Level

The following is a summary of some of the key international reports supporting the concept of ethnic equality data.

Name of Report	Body	Date	Key Extract
<b>Recommendations for 2010 Census round (2nd revision 2006)</b>	United Nations	2009	‘Ethnicity can be measured using a variety of concepts, including ethnic ancestry or origin, ethnic identity, cultural origins, nationality, race, colour, minority status, tribe, language, religion or various combinations of these concepts [...] The subjective nature of the term (not to mention increasing intermarriage among various groups in some countries, for example) requires that information on ethnicity be acquired through self- declaration of a respondent and also that respondents have the option of indicating multiple ethnic affiliations.’
<b>European Handbook on Equality Data</b>	European Commission	2016 (revision)	‘The lack of solid data relating to equality and discrimination limits our understanding on both the extent to which discrimination affects our everyday life and how best to tackle it. Only through independent and sound information outlining the reality of EU citizens can we truly go forward in the quest for an equal society across Europe.’
<b>Data Collection in the Field of Ethnicity</b>	European Commission	2017	‘Racial and ethnic minorities are now protected by anti-discrimination legislation across the Member States. The focus has turned to implementation and monitoring and in turn the need has arisen for data on (in) equalities based on racial and ethnic origin. Such data is essential to measure the level of implementation and monitor the impact of policies, but there are serious shortcomings as to data regarding the situation of racial and ethnic minorities.’
<b>European Network Against Racism</b>	Equality Data Collection. Facts and Principles	2016	‘Equality data are powerful tools against discrimination and exclusion, shedding light on the situation of groups that are at risk of discrimination but are invisible in general statistics or surveys. Reliable and comparable equality data are important to design effective legislation and policies – for instance anti-discrimination laws, monitor their effectiveness and put in place concrete solutions. For example, if we do not know how many Roma children are enrolled in education, we cannot begin to address segregation of Roma children in schools. Likewise, it is very difficult for employers to put in place diversity management policies if they do not have any data on the diverse profiles of their workforce’.

Name of Report	Body	Date	Key Extract
<b>European Commission</b>  [Linked to the National Traveller and Roma Inclusion Strategy. 2017-2021 in Ireland]	An EU Framework for National Roma Integration Strategies up to 2020	2011	‘At present, it is difficult to obtain accurate, detailed and complete data on the situation of Roma in the Member States and to identify concrete measures put in place to tackle Roma exclusion and discrimination. It is not possible to assess whether such measures have given the expected results. It is therefore important to collect reliable data’.
<b>European Commission</b>	EU Vademecum 10 Basic Principles for the Inclusion of Roma	2009	This Vademecum provides a practical check-list on how to implement each of the Principles. <ul style="list-style-type: none"> <li>• Constructive, pragmatic and non-discriminatory policies</li> <li>• Explicit but not exclusive targeting</li> <li>• Intercultural approach</li> <li>• Aiming for the mainstream</li> <li>• Awareness of the gender dimension</li> <li>• Transfer of evidence-based policies</li> <li>• Use of European Union instruments</li> <li>• Involvement of regional and local authorities</li> <li>• Involvement of civil society</li> <li>• Active participation of the Roma</li> </ul>
<b>University of Essex</b>	Disaggregated Data and Human Rights Law	2013	‘The United Nations Independent Expert on minority issues has stated that collection of disaggregated data constitutes both an “essential means” of identifying the scale of social and economic problems experienced by ethnic groups and in developing appropriate and effective policy and practice’.

# 10. The rationale and detailed proposals for an ethnic equality question in Census 2021

**The most important overall recommendation in this submission is that the revised Q14/11 question in Census 2021 should be firmly located and explained as an ethnic equality question for the following reasons that have featured throughout this report:**

**It explains why the question is being asked in the first place:** Framing the purpose of the question as collecting data for the purpose of ethnic equality will reassure people, including recent migrants unfamiliar about Ireland, that the ethnic equality question is not about ethnic profiling or for immigration/security reasons. This is particularly important for people from countries where ethnic data was abused for the purposes of persecution.

**It explains the format of the ethnic equality question:** If the collecting of data is for the purpose of promoting ethnic equality, then it suddenly becomes much clearer why the categories in the Census have been chosen and will be changed. People experience ethnic inequality and discrimination in a range of ways in Ireland based on their colour of skin and/or the ethnic group to which they belong. The rationale of ethnic equality clearly explains why the various categories have been chosen and others omitted.

**The present framework has already considerable acceptance:** The present format Q14/11 has not been met with significant and sustained opposition since it was introduced in 2006 as evidenced in its high response rate. In fact the main controversy has arisen when statutory authorities have deviated from the format in the Census or when groups have been omitted from the Census altogether.

**It is compatible with our nearest neighbours:** Under the present format, ethnic equality in Ireland can be compared with Northern Ireland, Scotland and England and Wales.

**The specificity of ethnic inequality in Ireland should be a factor that determines the format of the Census.** The inclusion of Roma; Black people from Sub Saharan Africa; people from the Arab world; Jews and people from Eastern Europe will give a fuller picture of inequality, racism and discrimination in Ireland. The inclusion of these Census categories is in part based on the specific history of Ireland in general and the specific history of ethnic diversity in particular.

**The continued grouping in the Census form of the ethnic equality question beside national origin and religion is crucial.** It is proposed that a new 'Jew' category should be included in the Religion section of the Census. Along with the 'Muslim' category, this section of the Census has the potential to address the inequalities associated with anti-Semitism and Islamophobia.

## Proposals for the 2021 Census

It is proposed on this basis of this ethnic equality rationale, that the following changes are made to Census 2021

## Placement in the Census

It is proposed that the ethnic equality question is grouped together with questions related questions such as national origin and religion.

## For the Notes section of the Census

Notes are provided to assist enumerators and respondents. This is a first draft of a possible note that should be further developed:

‘ The purpose of the ethnic equality question in Census 2021 is to help ensure that groups experiencing inequality on the basis of their ethnicity are more fully included in Irish Society. The principles underpinning the question seek to be consistent with the requirements of legislation in Ireland and good practice emerging at a national and European level. The evolution of the ethnic equality question has been undertaken in conjunction with Pavee Point and [List Other Bodies]. In response to this consultation a number of additional categories/choices have been added to this question, which first emerged on Census 2006’.

## Proposed Ethnicity Question for Census 2021

### What is your ethnic background?

Choose **ONE** section from A to F then ✓ the appropriate box.

<b>A</b>	<b>White</b>	
	1. Irish	<input type="checkbox"/>
	2. Eastern European	<input type="checkbox"/>
	3. Any other White Background	<input type="checkbox"/>
<b>B</b>	<b>Black or Black Irish</b>	
	4. African	<input type="checkbox"/>
	5. Sub Saharan African	<input type="checkbox"/>
	6. Any other Black Background	<input type="checkbox"/>
<b>C</b>	<b>Irish Traveller and Roma</b>	
	7. Irish Traveller	<input type="checkbox"/>
	8. Roma	<input type="checkbox"/>
<b>D</b>	<b>Asian or Asian Irish</b>	
	9. Chinese	<input type="checkbox"/>
	10. Indian, Pakistani or Bangladeshi	<input type="checkbox"/>
	11. Any other Asian background	<input type="checkbox"/>
<b>E</b>	<b>Arab</b>	
	12. North African	<input type="checkbox"/>
	13. Middle-Eastern	<input type="checkbox"/>
<b>F</b>	<b>Other, Including Mixed background</b>	
	14. Write in description:	

**Note this is predicated on an additional category of ‘Jew’ in the religion question (Q12)**



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