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**COMMITTEE OF EXPERTS ON INTERCULTURAL INTEGRATION OF MIGRANTS (ADI-INT)**

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# Training Manual on

# Equality Data Collection & Analysis to Prevent and Address Systemic Discrimination

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## *Preamble*

In accordance with its terms of reference and as a subordinate body to the Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI), the Committee of Experts on the Intercultural Integration of Migrants (ADI-INT) is instructed to design – among others – a capacity-building programme and tools for migrant integration supporting the implementation of Recommendation CM/Rec(2022)10 on multilevel policies and governance for intercultural integration (adopted by the Council of Europe Committee of Ministers on 6 April 2022).

The need for capacity building on preventing and addressing systemic discrimination is acknowledged both in the Recommendation CM/Rec(2022)10 and in the Model framework for an intercultural integration strategy at the national level. The former states in Article 19 of its Appendix, that *"Direct or indirect discrimination in the functioning of public administration and in public service delivery should be identified and eliminated in a systematic way, including by carrying out anti-discrimination audits and reviews, adopting anti-discrimination charters and action plans to favour integration, providing anti-discrimination and intercultural training as well as intercultural mediation and, where possible, employing participatory service design that involves a diverse range of users.".* The latter highlights the role of data in identifying that the starting point for any national or multilevel intercultural integration strategy is *"an evidence-based analysis of the situation that is to be addressed, through the prism of equality, diversity, interaction and participation".*

After discussing the features of systemic discrimination and the related challenges at its second meeting (18-19 October 2022 in Skopje, North Macedonia) and noting that effective action in this field would benefit from expertise and guidance, the ADI-INT decided to develop the "Training Manual on Equality Data Collection & Analysis to Prevent and Address Systemic Discrimination" (hereafter "training manual", tool 2 of the capacity-building programme[1]). The aim of the training manual is to help public authorities identify and prevent procedures, routines and organisational cultures that contribute to less favourable outcomes for minority groups than for the majority of population, including policies, programmes, employment and services.

This training manual is the result of the collaborative work of local, regional and national authorities. After having assessed and discussed the first draft of the Manual, the ADI-INT decided to disseminate it among member cities of the Intercultural Cities (ICC) programme for testing purposes, with the view to enable them providing feedback and suggestions for improvements before finalising it.

[1] A manual for guiding state authorities in the design of their own intercultural competence course has previously been developed by the ADI-INT (tool 1 of the capacity-building programme). It is available here.

# 1. Introduction

## 1.1 Starting points

The Model framework for an intercultural integration strategy at the national level, adopted by the Council of Europe's Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI) in June 2021 (hereinafter "Model Framework"), establishes the underlying principles of intercultural integration as: ensuring equality (including combating all forms of discrimination), valuing diversity, fostering meaningful interaction, and facilitating active citizenship and participation[2]. It notes that *"understood as policy goals, these principles help address the full range of diversity challenges and maximise the impact of policy and grass-roots action in the field of equality"*[3].

Under the principle of 'Ensuring Equality', the Model Framework states that *"measures should be adopted to deal with both direct and indirect discrimination, with a special focus on systemic discrimination, on the basis of "visible" diversity as well as inequality motivated by cultural difference, gender, sexual orientation and gender identity and other protected characteristics"*. It emphasises the role of data in identifying that the starting point for any national/multilevel intercultural integration strategy is *"an evidence-based analysis of the situation that is to be addressed, through the prism of equality, diversity, interaction and participation"*.

Likewise, the Recommendation CM/Rec(2022)10 of the Committee of Ministers to member States on multilevel policies and governance for intercultural integration, adopted by the Committee of Ministers on 6 April 2022, under the same principle of 'Ensuring Equality', states that *"Direct or indirect discrimination in the functioning of public administration and in public service delivery should be identified and eliminated in a systematic way, including by carrying out anti-discrimination audits and reviews, adopting anti-discrimination charters and action plans to favour integration, providing anti-discrimination and intercultural training as well as intercultural mediation and, where possible, employing participatory service design that involves a diverse range of users"*[4].

This training manual has been developed out of this concern to address and prevent systemic discrimination, and with a view to underpinning this focus on the role of data in enabling effective action on systemic discrimination. It will further help Council of Europe member states to acquire some of the skills that are needed to implement the recommendations of the Committee of Ministers in this field. Data have a particular contribution to make in addressing and preventing systemic discrimination given that this is a phenomenon that is often invisible and without apparent intent.

**Systemic discrimination** involves the procedures, routines and organisational culture of any organisation that, often without intent, contribute to less favourable outcomes for minority groups than for the majority of the population, from the organisation's policies, programmes, employment, and services.[5]

[2] These principles are defined in the glossary of terms at the end of this training manual.
[3] Model framework for an intercultural integration strategy at the national level: Intercultural integration strategies, managing diversity as an opportunity, Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI), Council of Europe, 2021.
[4] Recommendation CM/Rec(2022)10 of the Committee of Ministers to member States on multilevel policies and governance for intercultural integration (Adopted by the Committee of Ministers on 6 April 2022 at the 1431st meeting of the Ministers' Deputies).
[5] Policy Brief: Identifying and Preventing Discrimination at the Local Level, Intercultural Cities Programme, Council of Europe, 2020.

Systemic discrimination comes under a range of titles in the literature including "structural discrimination"; "institutional discrimination"; and "systematic discrimination". It is not specifically defined in international or European legislation.

This manual draws more specifically from the work on systemic discrimination undertaken within the Intercultural cities (ICC) programme of the Council of Europe. This includes the 'Policy Brief: Identifying and Preventing Discrimination at the Local Level', published in 2020[6], and its accompanying Policy Study[7]. The policy brief defines systemic discrimination (as above) and identifies four strands of action required on this issue at the local level, with equality data having a key role in rendering the issue visible and in providing an evidence-base for effective action.

The training manual addresses the national, regional and local levels of governance, reflecting that all levels of governance have a necessary contribution to make in addressing and preventing systemic discrimination. It aligns with Recommendation CM/Rec(2022)10[8] which defines multilevel governance as a model of governance embracing central, regional and local governments, as well as civil society organisations. It states that *"member States should adopt a holistic approach to integration by ensuring that public policies in all fields and at all levels, as well as civil society stakeholders, contribute to the goal of building inclusive societies."*

## 1.2 Purpose and target audience

This training manual focuses on the use of equality data in addressing and preventing systemic discrimination.

The aims are to:

- enable the awareness and understanding of users of the potential of equality data in responding effectively to systemic discrimination, the issues in collecting and analysing equality data, and the need for and nature of targeted equality data initiatives alongside equality data strategies, at all levels of governance; and
- inform and enable action by users on the collection and analysis of equality data, in a manner that can advance effective responses to systemic discrimination.

The target audience encompasses:

- Stakeholders at all levels of governments engaged in:
  - progressing the policy cycle of: policy thinking, policy making, policy implementation and policy monitoring and evaluation; and
  - data collection and management, and undertaking research and data analysis.
- Stakeholders from:
  - public policy institutions, statistical and research institutions, official statutory statistical bodies, academia, and civil society organisations, at the national, regional, and local levels of governance.

[6] Policy Brief: Identifying and Preventing Discrimination at the Local Level, Intercultural Cities Programme, Council of Europe, 2020.

[7] Identifying and Preventing Systemic Discrimination at the Local Level, Intercultural Cities: Policy Study, Council of Europe, Strasbourg, 2020.

[8] Recommendation CM/Rec(2022)10 of the Committee of Ministers to member States on multilevel policies and governance for intercultural integration (Adopted by the Committee of Ministers on 6 April 2022 at the 1431st meeting of the Ministers' Deputies).

## 1.3 Content

This training manual addresses, in turn, each of the three following modules:

- **Module one: Equality Data – Purpose and Principles**, which establishes the issue of systemic discrimination and explores the potential roles for equality data collection and analysis in addressing this issue, and the challenges in this.
- **Module two: Targeted Equality Data Initiatives**, which explores a developmental approach to engaging with communities in generating and learning from equality data.
- **Module three: An Equality Data Strategy**, which explores an institutional approach to realising ongoing and systematic collection, analysis and use of equality data to inform and shape policy and programme development.

Each module of the training manual includes material on approaches to and issues in collecting and analysing equality data in order to address and prevent discrimination, alongside food for thought exercises, quiz questions, checklists and reference documents. It also features an intercultural glossary of key terms as an appendix.

## 1.4 Reference documents

In relation to the context for this training manual, the main Council of Europe reference documents include:

> Model framework for an intercultural integration strategy at the national level: Intercultural integration strategies, managing diversity as an opportunity, Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI), Council of Europe, 2021.
>
> Recommendation CM/Rec(2022)10 of the Committee of Ministers to member States on multilevel policies and governance for intercultural integration (Adopted by the Committee of Ministers on 6 April 2022 at the 1431st meeting of the Ministers' Deputies).

# 2. Module one: Equality data - Purpose and principles

This module examines and explores the underpinning elements for action on equality data collection and analysis in seeking to prevent and address systemic discrimination. It first establishes the nature and impact of systemic discrimination. It then examines equality data and the role of such data in responding to systemic discrimination. Finally, it explores the challenges faced in collecting equality data and the values that need to be engaged in meeting these challenges.

## 2.1 Systemic discrimination and equality data

***Systemic discrimination***

The Model Framework points to the imperative of addressing systemic discrimination within such a strategy, as part of the policy goal of ensuring equality. In this it draws attention to the work done by the Intercultural Cities programme on this issue, which advances a definition of systemic discrimination as:

> *Systemic discrimination involves the procedures, routines and organisational culture of any organisation that, often without intent, contribute to less favourable outcomes for minority groups than for the majority of the population, from the organisation's policies, programmes, employment, and services.*[9]

Systemic discrimination is not an immediately visible issue. It is rarely a result of specific intent. It is a complex phenomenon to identify and establish. Yet, it drives disadvantage and inequality for a wide range of groups in society. This disadvantage and inequality are of an entrenched and inter-generational nature. Systemic discrimination thus undermines any ambition for ensuring equality (including non-discrimination), valuing diversity, fostering meaningful intercultural interaction, or promoting active citizenship and participation, the four principles identified as underlying intercultural integration[10].

Systemic discrimination can operate across the full spectrum of institutional endeavour: policy making; programme design; service delivery; and employment. It can be identified across the full spectrum of policy fields: employment, income, education, health, housing, culture, policing, public infrastructure, and beyond. It can be evident at all levels of governance: national, regional, and local.

Systemic discrimination becomes visible in the situation and experience of groups such as women, racialised groups[11], LGBTI persons, persons with disabilities, lone parents, carers, older persons, young persons, persons with particular religious beliefs, and persons of particular socio-economic status. Unequal outcomes for these groups are the markers of systemic discrimination being at issue.

***Equality data***

Equality data are understood *'as any piece of information that is useful for the purposes of describing and analysing the state of equality. The information may be quantitative or qualitative in nature'.*[12]

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[9] Identifying and Preventing Systemic Discrimination at the Local Level: Policy Brief, Intercultural Cities, Council of Europe, Strasbourg, 2020.

[10] These principles are defined in the glossary of terms at the end of this training manual.

[11] See: ECRI Opinion on the Concept of Racialisation, adopted at ECRI's 87th plenary meeting on 8 December 2021 - ""racialisation" as the process of ascribing characteristics and attributes that are presented as innate to a group of concern to it and of constructing false social hierarchies in racial terms and associated exclusion and hostility. The use of the concept of "racialisation" has the potential to aid understanding of the processes underpinning racism and racial discrimination and to ensure that the voices of racialised groups are heard and taken into account".

[12] Makkonen T., European Handbook on Equality Data, DG Justice and Consumers, European Commission, 2016.

The gathering and analysis of such data has proven challenging and requires the development of suitable structures and systems at all levels of governance to drive the change needed.

There is limited guidance available on such structures and systems. However, the European Commission, through its High-Level Group on Non-discrimination, Equality, and Diversity, has progressed useful initiatives on equality data that offer a structure and approach that is used increasingly widely, and that can be adapted for different member state contexts and different levels of governance.

Equality data include:

- data specifically gathered in relation to specific groups, that are aggregated to capture situations and experiences of inequality or their causes or effects; and
- data gathered for other purposes that are disaggregated, in being broken down by specific groups to assess the comparative situations of these groups.

These specific groups include for example: women; racialised groups; LGBTI persons; persons with disabilities; lone parents; carers; older persons; young persons; persons with particular religious beliefs; and persons of particular socio-economic status.

Equality data can capture:

- the situation of these groups, in terms of disadvantage in the level and quality of resources the group can access, and in the outcomes for the group resultant from this;
- the experience of these groups, in terms of the quality and nature of the group's engagement with wider society, including their engagement with public and private entities; and
- the identity of these groups, in terms of the manner in which the group gives expression to its identity and to any lack of recognition for this diversity that leads to unmet needs.

***The role of equality data in addressing systemic discrimination***

Equality data on the situation, experience, and identity of the groups exposed to discrimination, renders systemic discrimination visible in terms of its resultant outcomes. Such data assists in making this discrimination visible and providing and evidence base from which to address it.

*Four interlinked strands of activity are identified as necessary to address systemic discrimination:*

- *to gear up, in creating the conditions within an organisation to tackle the issue;*
- *to identify, in uncovering and rendering systemic discrimination visible;*
- *to prevent, in developing systemic remedies to what is a systemic problem; and*
- *to share practice, in enabling a coherent response to the issue across all sectors.*[13]

The collection and analysis of equality data are central to two of these strands of activity: to **gear up** to address the issue (1); and to **identify** systemic discrimination, making it visible (2).

*(1) To gear up to address systemic discrimination* requires establishing: leadership; an organisational infrastructure to drive action on the issue; and standards set in relation to the issue. The organisational infrastructure required involves: an equality policy; a driver for action in the form of a cross-organisational committee, with responsibility to plan for, coordinate, support and monitor action on the issue; an action plan on the issue; capacity building on the issue; and equality and diversity data systems.

[13] Identifying and Preventing Systemic Discrimination at the Local Level, Intercultural Cities: Policy Study, Council of Europe, Strasbourg, 2020.

In this strand of gearing up, the focus on equality and diversity data systems encompasses:

- Strengthening the organisational systems that gather and analyse data on policy beneficiaries, service-users, and staff of an organisation, such that they capture the situation and experience of the diverse groups exposed to systemic discrimination.
- Availing of these organisational systems to gathering and analyse both quantitative and qualitative equality data.

*(2) To identify systemic discrimination* requires: diagnosing issues of systemic discrimination; dialogue on issues of systemic discrimination; and monitoring incidents and patterns of discrimination.

In this strand of identifying systemic discrimination, all three of these types of initiative offer sources of necessary equality data, both quantitative and qualitative:

- **Diagnosis** establishes an overview of the situation, experience, and specific needs of groups experiencing inequality, in order to identify systemic discrimination, and improve the outcomes achieved for these groups from an organisation's policies, plans, programmes, and practices. It involves studies and surveys of the targeted population and its diversity.
- **Dialogue** engages with and learns from people and groups who are at risk of systemic discrimination, and their representative organisations, in order to apply and respond to this knowledge and understanding. It involves: an accessible process to enable this voice to be heard; analysis of the knowledge gathered to establish implications for policy and practice; and publicly reporting on the findings and conclusions.
- **Monitoring** tracks and establishes the nature, patterns, and level of incidents of discrimination, of all forms, and ensures redress is available. It involves: provision of advice, support and redress for complainants; tracking complaints made over time; and analysing and reporting on the patterns of complaints and the implications of these.

## 2.2 Purpose of equality data collection and analysis

The overarching aim of equality data collection and analysis to prevent and address systemic discrimination is to enhance the situation and experience of groups exposed to such discrimination and ensure needs specific to these groups are appropriately addressed. Within this overarching aim, it is important to consider the specific purpose being pursued in collecting and analysing equality data when seeking to prevent and address systemic discrimination.

This purpose is the key starting point in collecting and analysing equality data. There is a need for clarity on why the equality data is being collected. The collection and analysis of equality data is not and must not be the ultimate goal, but is the means to achieving equality-related goals.

> **Clarity of purpose** enables the implications of the identified purpose to be teased out in terms of: what equality data is needed; how best to collect this data; and how best to analyse the data gathered.

Purpose is concerned with those exposed to discrimination and inequality, the wider society, and institutions that make policy, employ staff and provide services. Purpose encompasses objectives to:

- (1) empower the specific groups experiencing inequality;
- (2) inform policymaking and its potential impact, and enable its evaluation;
- (3) shape organisational practice and outcomes, and enable their evaluation; and

- (4) monitor and respond to issues of discrimination and harassment, and evaluate progress made.

(1) The purpose of equality data collection and analysis is first and foremost to empower people that experience inequality and that are exposed to discrimination.

> Equality data is collected and analysed in order to enable these groups to achieve equality outcomes. Equality data is gathered from and about these groups with a view to learning together with these groups in order to advance initiatives that effectively improve their situation and experience and meet their specific needs.

(2) Equality data can be collected and analysed to inform policymaking and enable its evaluation.

> Effective policymaking requires an adequate and appropriate understanding of the issues and gaps to be addressed. Equality data collection and analysis enables this understanding and underpins good and just decisions by policy makers. Equality data are required to inform all policy fields including: employment, income, education, health, housing, culture, policing, public infrastructure, and beyond. This ensures policies are free from all forms of discrimination and effective in achieving equality outcomes.

(3) Equality data can be collected and analysed to shape organisational practice and enable its evaluation.

> Organisations need equality data about the diversity and composition of their staff so that they can create the conditions to adequately and appropriately reflect the community and society within which they operate among their staff, and to effectively eliminate all forms of discrimination.
>
> Organisations need equality data about the diversity of customers and service-users, and policy beneficiaries, to create the conditions to ensure equal outcomes and eliminate all forms of discrimination for customers and service-users, and policy beneficiaries.

(4) Equality data can be collected and analysed to monitor discrimination and harassment, and evaluate progress made.

> Equality data render all forms of discrimination visible and track their evolution over time. Equality data enable an understanding of discrimination and the different forms it takes, how it occurs, how it is experienced, and how it impacts on people. In this equality data inform effective responses to all forms of discrimination, enable impactful awareness raising and education initiatives about this discrimination, and support effective use of equal treatment legislation.

The European Commission against Racism and Intolerance (ECRI) of the Council of Europe has emphasised the importance of equality data, in recommending that member states collect data which will assist in assessing and evaluating the situation and experiences of groups which are particularly vulnerable to racism, xenophobia, antisemitism and intolerance.[14] This listing has expanded over time

[14] ECRI GENERAL POLICY RECOMMENDATION No. 1 on Combating Racism, Xenophobia, Anti-Semitism, and Intolerance, adopted on 4 October 1996, CRI(96)43.

and further ECRI work, including, for example, groups vulnerable to islamophobia[15]. ECRI has regularly recommended consistent, systematic and comprehensive equality data collection and analysis in member states in its country reports, given its importance in shaping sound policies, promoting equal opportunities, and evaluating the effectiveness of and the progress made through social policies.

## 2.3 Values engaged in equality data collection and analysis

The collection and analysis of equality data is usefully framed and informed by values of:




**Dignity:** reflects a valuing of human worth and involves relationships of mutual respect, trust, and respect for privacy.

*The UN Office of the High Commissioner for Human Rights emphasises that the overriding human rights principle '*do no harm*' should be respected in data collection and analysis[16]. As such, equality data collection and analysis should not create or reinforce existing discrimination, bias or stereotypes; and data on personal characteristics should be kept safe and used only for the benefit of the groups they describe and society as a whole. In this, participation, disaggregation, self-identification, transparency, privacy, and accountability are emphasised.*

Dignity points to the need for equality data collection and analysis to involve:

- **relationships of trust**, with time taken to build, structure, and nurture such relationships with those who are the subject of equality data collection and analysis;
- **self-identification**, with people who are the subject of equality data collection afforded the opportunity to identify, or not, whatever data category or characterisation they might belong to;
- **transparency**, with clear communication of the purpose of, approach in, and outcomes from the collection and analysis of equality data to all stakeholders, in particular those groups who are the subject of such initiative;
- **privacy**, with steps taken to ensure individuals providing data are not identified or identifiable, directly or indirectly, where such data is published or made publicly accessible; and

[15] ECRI GENERAL POLICY RECOMMENDATION No. 5 (Revised) on preventing and combating anti-Muslim racism and discrimination, adopted on 8 December 2021, Council of Europe.
[16] A Human Rights Based Approach to Data: Leaving no one behind in the 2030 Agenda for Sustainable Development, Office of the High Commissioner for Human Rights, United Nations, 2017.

- **accountability**, with those responsible for equality data collection and analysis being subject to clear lines and forms of accountability, in particular to those who are the subject of such data collection and analysis.

**Participation:** reflects the need to engage with people and groups such their voices are heard and have influence in decision-making, and involves processes to enable and empower them in this participation, and structures and systems to ensure their experience and expertise are recognised and their views have influence and are taken into account.

*The Model Framework identifies that the 'vertical process of multilevel governance must be complemented by a horizontal process of public participation, in the design, delivery and evaluation of intercultural integration plans', and emphasises that 'participation, by individuals and through non-governmental organisations, is essential to match the complexity of the "diversity of diversity", to engender a sense of stakeholding, especially on the part of individuals and organisations of minority backgrounds, and to gain widespread public buy-in to intercultural integration plans'*[17].

Participation points to the need for equality data collection and analysis to involve:

- **co-production and consultation**, with those who are the subject of such an exercise, in the design and implementation of equality data collection and analysis processes;
- initiatives to **support** and strengthen the collective voice of those people and groups, including their representative organisations, who are the subject of equality data collection and analysis;
- **provision of information** on the need for and use of equality data to those who are the subject of equality data collection and analysis, to enable their informed participation; and
- **recognition of** the experience, expertise, and knowledge held within the groups that are subject for data collection and analysis.

**Comprehensiveness:** reflects a concern to include a focus on all groups experiencing inequality, and involves addressing all the relevant policy fields and arenas within which such inequality is generated and experienced.

*Comprehensiveness in equality data collection and analysis is emphasised in the guide of the European Commission, in order to ensure that the full range of key areas of life where discrimination can occur is captured by equality data sources: employment, education, access to goods and services, housing, health, poverty/social exclusion, political and civic participation, etc.*[18]

Comprehensiveness points to the need for equality data collection and analysis to involve:

- a **holistic focus** in addressing a breadth of policy fields, including such as employment, income, education, health, housing, culture, policing, public infrastructure, and beyond, and doing so across all governance levels;
- a **broad focus** to encompass groups such as women, racialised groups, LGBTI persons, persons with disabilities, lone parents, carers, older persons, young persons, persons with particular religious beliefs, and persons of particular socio-economic status;

[17] Model framework for an intercultural integration strategy at the national level: Intercultural integration strategies, managing diversity as an opportunity, Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI), Council of Europe, 2021.

[18] Guidelines on Improving the Collection and Use of Equality Data, Subgroup on Equality Data, High Level Group on Non-Discrimination, Equality, and Diversity, DG Justice and Consumers, European Commission, 2021.

- an **intersectional focus** in encompassing those people at the intersections of these groups; and
- taking a **multi-layered approach** in gathering and analysing equality data within the wider population, in an organisation, and of a specific community.

**Effectiveness:** reflects an ability to achieve planned outputs and outcomes, and involves a planned and systematic approach to realising goals.

*An effective approach to equality data collection and analysis is identified in the guide of the European Commission as requiring action to: enhance the capacity of relevant stakeholders to collect reliable and robust equality data; ensure that the staff from different stakeholders regularly engaging in equality data collection have the relevant skills, expertise and awareness of best practice; and promote an institutional culture acknowledging the need for robust and reliable equality data to ensure evidence-based policy making across public institutions and all relevant stakeholders*[19].

Effectiveness points to the need for equality data collection and analysis to involve:

- **inter-institutional cooperation**, at all levels of governance, that draws in the full range of organisations collecting and holding equality data;
- **broad stakeholder engagement** that encompasses equality bodies and civil society organisations representative of groups that are the subject for data collection and analysis;
- **investment in the systems and initiatives** required for the adequate and appropriate collection and analysis of equality data by the relevant organisations;
- **staff training** across stakeholder organisations engaged, to build capacity in data generation and analysis, and expertise in the culture of data analysis;
- fostering approaches to equality data collection and analysis that encompass both **quantitative and qualitative approaches**, and that include targeted initiatives alongside wider equality data strategies; and
- taking action to **address the implications** of the equality data collected and the recommendations from the analysis undertaken.

Respect for data protection frameworks is important and is reflected in the above values frame. However, the inaccurate interpretation of data protection frameworks can be a barrier to the collection and analysis of equality data.

Data protection frameworks do not prohibit the collection and analysis of equality data, rather they establish the conditions under which the collection and analysis of equality data is allowed. Further, data protection frameworks do not apply to anonymised data, which does not relate to an identified or identifiable natural person, or which relates to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable.

The collection and analysis of such personal data must involve consent from the subject of the data being collected, to the processing of the data for the objective underpinning its collection that is specified. Further, the collection and analysis of such personal data must be for an objective that is necessary for reasons of substantial public interest, statistical purposes, scientific or historical research purposes, or for archiving purposes in the public interest.

[19] Guidelines on Improving the Collection and Use of Equality Data, Subgroup on Equality Data, High Level Group on Non-Discrimination, Equality, and Diversity, DG Justice and Consumers, European Commission, 2021.

The values frame set out above, and careful alignment with the concrete steps set out for each value, will enable compliance with these conditions, in particular taking those steps that relate to the value of dignity.

## 2.4 Multilevel governance

*The Model Framework identifies that 'multilevel governance should be applied throughout the whole life of the intercultural integration strategy, from the needs assessment to the conception, implementation and evaluation of the strategy. Given that many competences and responsibilities are shared between the various levels of governance in different countries, multilevel governance is needed to achieve further collaboration between different administrations, better public policies implementation and a greater cohesion'*[20].

Addressing systemic discrimination, a key part of any intercultural integration strategy, is thus a responsibility for all levels of governance. Therefore, the collection and analysis of equality data to serve this goal, should be seen as a task for all levels of governance.

The approaches proposed in this training manual for equality data collection, both targeted initiatives and equality data strategies, can be pursued across all levels of governance. In this it will be important to secure coherence and sharing of learning across and between these different levels of governance.

## 2.5 Food for thought

Your organisation, at its particular level of governance, is concerned to improve its collection and analysis of equality data.

- What purpose would you identify as a priority for further equality data collection and analysis in your organisation?
- What are the implications of this purpose for your approach to the collection and analysis of this equality data?

## 2.6 Quiz

Question 1. What are the key features of systemic discrimination?

A. Inefficient and ineffective organisational systems.
B. Organisational procedures, routines, and culture that result in disadvantage for particular groups.
C. Individual managers that make decisions that lead to exclusion of or discrimination against members of particular groups.

*Feedback*: B best hits the mark.

Systemic discrimination does involve inefficient and ineffective organisation systems, but it goes beyond poor performance of an organisation in specifically disadvantaging particular groups in the outcomes achieved from these systems.

[20] Model framework for an intercultural integration strategy at the national level: Intercultural integration strategies, managing diversity as an opportunity, Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI), Council of Europe, 2021.

While individuals might at some point design and implement the procedures and routines of an organisation, systemic discrimination looks beyond individual acts of discrimination to capture the discrimination that emerges from the manner in which key institutions function – a form of discrimination that is often without intent.

Question 2. What are the key contributions of equality data to addressing systemic discrimination?

A. Equality data enable an organisation to protect itself from criticism and from claims of discrimination.
B. Equality data provide insights into the issues within communities experiencing inequality.
C. Equality data make systemic discrimination visible; and equality data provide an evidence-base to inform responses to systemic discrimination.

*Feedback*: C best hits the mark.

Equality data are collected for a purpose, a purpose that is to the benefit of those that are the subject of the data being gathered and analysed. In making systemic discrimination visible, they enable and inform review and redesign of procedures and routines and reshaping of organisational culture to achieve more equal outcomes form these groups from the functions of the organisation.

There might be secondary benefits to the gathering of such data that include protection for the organisation or better understanding of the internal dynamics of communities, this cannot be the primary purpose for their collection in seeking to prevent and address systemic discrimination.

Question 3. How should the value of participation be engaged in equality data collection and analysis?

A. Participation is about getting the key stakeholder organisations around the table to get their input into the data collection initiative.
B. Participation is about involving those who are subject of data collection as co-producers of any such initiative.
C. Participation is about giving feedback to the communities involved on the what the issues that the equality data is pointing to.

*Feedback*: B best hits the mark

Co-production with those who are the subject of equality data collection places these groups at the centre of the process. There are other stakeholder organisations that can usefully be involved, but that is a secondary concern. Feedback is an important element within co-production, but it is not sufficient of itself.

## 2.7 Checklist

In taking initiatives to support action on systemic discrimination through equality data collection and analysis, have you put in place the necessary foundations?

This is the case if:

- ☐ A specific purpose has been established and communicated, for which the equality data is to be collected and analysed.
- ☐ Processes to empower those who are the subject of the equality data to be collected and analysed have been implemented, including communication with these communities, strengthening relationships of trust, and engaging representatives in co-production of the equality data initiatives or strategies.
- ☐ Institutional commitments to take action to address systemic discrimination, in policy and practice, have been made to accompany and respond to the learning from the equality data collected and analysed.

## 2.8 Reference documents

In relation to systemic discrimination:

Identifying and Preventing Systemic Discrimination at the Local Level, Intercultural Cities: Policy Study, Council of Europe, Strasbourg, 2020.

In relation to equality data collection:

Guidelines on Improving the Collection and Use of Equality Data, Subgroup on Equality Data, High Level Group on Non-Discrimination, Equality, and Diversity, DG Justice and Consumers, European Commission, 2021.

Guidance note on the collection and use of equality data based on racial or ethnic origin, Subgroup on Equality Data, High Level Group on Non-Discrimination, Equality, and Diversity, DG Justice and Consumers, European Commission, 2021.

# 3. Module two: Targeted equality data initiatives

This module examines and explores the development and implementation of targeted equality data initiatives. It first establishes the aim and focus of targeted equality data initiatives and the elements of the developmental approach they require. It then explores the challenges to be met for quality targeted equality data initiatives. Finally, it examines different types of targeted equality data initiative, their purpose and nature, providing some exemplars of these.

## 3.1 Developmental approach

***Aim and focus for targeted equality data initiatives***

Targeted equality data initiatives aim both to empower communities exposed to discrimination and inequality, and to contribute to change in their situation and experience.

Targeted equality data initiatives can focus on:

- local area-based populations with a view to exploring territorial equity in the situation of particular groups;
- specific groups with a view to exploring the situation, experience and identity, or specific needs, of these groups; and
- staff within an organisation with a view to exploring the situation, experience, and identity, or specific needs, of particular groups among staff of the organisation.

***Approach to developing and implementing targeted equality data initiatives***

Targeted equality data initiatives, with their concern to empower the groups concerned, involve a developmental approach. A developmental approach includes processes for:

- relationship and trust building to prepare for the initiative;
- enabling leadership from the group concerned within the initiative;
- securing engagement with the group concerned in the design, implementation, and outcome from the initiative; and
- achieving mutual learning through the initiative.

Targeted equality data initiatives include a focus on both qualitative data and quantitative data.

Two key strands of targeted equality data initiatives can be identified:

- Building a knowledge base (see section 3.2 below), which can be:
    - institution-based, in terms of institutional structures with a mandate in relation to gathering and analysing equality data; or
    - research-based, in terms of research and survey work to identify, analyse and understand patterns of inequality and discrimination.
- Community engagement (see section 3.3 below), which can involve processes of shared learning on issues of and responses to the situation, experience and identity, or specific needs of, particular groups exposed to inequality and discrimination, and which can be based on: area-based populations; specific groups; or staff members.

It is of note, in relation to the strand on building a knowledge base, that ECRI developed a recommendation to member states on the need to ensure national surveys on the experience and

perception of racism and discrimination from the point of view of potential victims are undertaken, with guidelines on this process.[21]

***Multilevel governance***

Targeted equality data initiatives, of both types, can be implemented at all governance levels – national, regional, and local.

For the strand of building a knowledge base, exemplars are readily developed at all levels and can be done so in an interconnected manner.

ECRI, by way of illustration, has recommended that member states undertake research into the nature, causes and manifestations of racism, xenophobia, antisemitism and intolerance at local, regional and national level,[22] and that they would encourage and support research projects and independent monitoring of anti-Muslim racism and discrimination.[23]

For the strand of community engagement, exemplars are most readily developed at the local level in relation to area-based populations and specific communities, given the more immediate access to these groups at this level. Nonetheless, targeted equality data initiatives of this nature can be tailored to the regional and national levels, particularly in relation to the design of the engagement with the groups concerned.

When it comes to staff members, exemplars are more readily developed at all levels of governance given their organisational basis.

***Challenges in developing and implementing targeted equality data initiatives***

Equality data and information is limited and there can be difficulty in accessing the limited equality data and information that exists for use in targeted equality data initiatives.

Creating shared understanding of and achieving an engagement on equality data issues across a range of organisations requires leadership and resources if it is to be effective and long-term.

There can be a reluctance to explore issues pertaining to one's own organisation and an unwillingness to look into one's own organisation. This presents barriers to adequately capturing and understanding issues of systemic discrimination, and engaging with the responses required.

Under-reporting of discrimination, and in particular systemic discrimination, is high which renders these issues less visible. Under-reporting is driven by lack of trust in agencies, the belief that change cannot occur, a normalisation of discriminatory treatment, and fear of consequences for having reported an incident.

There can, further, be an under-recording of discrimination. This is a result of inadequate systems to receive and respond to complaints or lack of capacity to implement such systems where they are in place.

Data on systemic discrimination, other than data on outcomes for affected groups, is difficult to gather.

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[21] ECRI GENERAL POLICY RECOMMENDATION No. 4 on National Surveys on the Experience and Perceptions of Discrimination and Racism from the Point of View of Potential Victims, Adopted on 6 March 1998, CRI(98)30.
[22] ECRI GENERAL POLICY RECOMMENDATION No. 1 on Combating Racism, Xenophobia, Anti-Semitism, and Intolerance, adopted on 4 October 1996, CRI(96)43.
[23] ECRI GENERAL POLICY RECOMMENDATION No. 5 (Revised) on preventing and combating anti-Muslim racism and discrimination, adopted on 8 December 2021, Council of Europe.

There is a need for creativity in adequately attending to intersectionality and the situation, experience, and identity, or specific needs, of those people at the intersections between these groups.

## 3.2 Building a knowledge base

Building a knowledge base is one strand of targeted equality data initiatives, initiatives which are specifically undertaken to gather data on groups experiencing inequality. This strand can involve the establishment and operation of a dedicated institution (1), or it can involve the undertaking of research initiatives (2).

***(1) Type of initiative:*** Establish an institutional infrastructure with a mandate in relation to equality data.

***Purpose:*** Gather, analyse, hold and disseminate data on issues of discrimination and inequality, including systemic discrimination, such that it can inform policy and programmes.

***Nature:*** This institutional infrastructure can take a range of forms, including:

- a stand-alone observatory with a mandate on equality data;
- a consultative body on equality data;
- an equality data working group; or
- community-led partnerships of research expertise, academia, public bodies, and local communities affected by discrimination and inequality.

While this case study is at the local level, it can very immediately be replicated at the regional and national levels. The institution that is the focus for this case study could well be located at a national or a regional level. Purpose specific to the level of governance undertaking the initiative would need to be established to inform the design of the initiative.

The key challenge in locating such initiative at these levels of governance is that of reach, of getting to the point where discrimination is happening and being recorded:

- reach could be enabled with the involvement of networks of organisations; or
- reach could be enabled with a multilevel approach where observatories are in place and linked across the different levels of governance.

**Case study: An observatory in Barcelona, Spain**

***Purpose:*** The Barcelona Discrimination Observatory works, since 2018, to make visible any situations of discrimination in the city, and to contribute to the scale and design of the actions required to address such situations.

***Structure:*** The observatory is a partnership initiative involving:

- the Office for Non-Discrimination of the Barcelona City Council, which monitors, investigates, and reports on cases of discrimination, providing psycho-social care, legal advice, and conciliation and mediation;
- the Human Rights Resource Centre of the Barcelona City Council, which gathers resources on human rights, organises training on discrimination and human rights, advises on human rights from a municipality perspective; and oversees compliance with human rights protocols; and
- the Board of Organisations for the Assistance of Victims of Discrimination which is currently made up of 26 social entities that assist victims of discrimination, which functions to better

coordinate the response of public institutions and social entities to discrimination, and as a space for training and the dissemination of the problems that are worked on.

***Initiative:*** the observatory publishes an annual report on discrimination, with a specific topic in particular focus in each edition, such as, most recently, discrimination in housing. It addresses: Who is being discriminated against? Who discriminates? Where does this discrimination take place? On what ground is this discrimination? How has the discrimination been expressed? What rights have been violated? What response has been given to the victims and with what result?

The report covers ten grounds: racism and xenophobia, disability, language, religion, health, age, gender, ideology, aporophobia, and LGBTI phobia, including an intersectional perspective. It addresses discrimination by individuals, private organisations/companies, public authorities, and police forces. It encompasses both direct and indirect discrimination, though the main focus to date has been on direct discrimination which includes: differential treatment, verbal assaults, physical assaults, discriminatory and hate speech, and vandalism.

***Process:*** The report draws from the data held by, and the reflections of, the Office for Non-Discrimination and the member organisations of the Board of Organisations for the Assistance of Victims of Discrimination. It combines quantitative and qualitative data. The report incorporates data from the survey of neighbourhood relations and coexistence of the Barcelona Metropolitan Area, published by the Institute for Regional and Metropolitan Studies of Barcelona.

*Key reference document:* Barcelona Discrimination Observatory Report 2021, Barcelona City Council, 2022.

***(2) Type of initiative:*** Undertake research specifically on the issue of systemic discrimination.

***Purpose:*** Present an evidence-based picture of the reality of systemic discrimination, and inform and enable action to be taken for its elimination.

***Nature:*** This research can involve a range of processes, including:

- research initiatives generating and analysing new equality data;
- analysis of and report on existing equality data;
- annual reports on and analysis of incidents of reported discrimination;
- community engagement and dialogue;
- hearings on the issue of systemic discrimination;
- use of survey tools; or
- development of indicators to monitor, track and measure progress in addressing the issue.

While these two case studies are at the local level, they can very immediately be replicated at the regional and national levels. The research that is at the core of these case studies could well be undertaken at the regional and national level. Purpose specific to the level of governance undertaking the initiative would need to be established to inform the design of the initiative.

The key challenges in locating such initiative at these levels of governance are of scale and impact:

- scale can be addressed in the nature of the research undertaken and invested in, or it could be addressed in a multilevel approach that involves a programme of linked and coherent research projects; and
- impact requires a strategy to ensure the research findings are addressed appropriately by the level(s) of governance involved.

**Case study: Reaching a point from which to take action in Oslo, Norway**

***Purpose:*** Oslo Municipality undertook a research initiative to gather data on experiences of discrimination, alongside an initiative to develop indicators to measure progress made in response to the research. The purpose of these initiatives was to enable an effective focus on diversity in strategic policy documents, secure a high standard of equal services in service delivery, and respond to the high levels of under-reporting of discrimination.

***Stimulus:*** Political commitment to equality and non-discrimination drove this initiative, as part of detailed commitments made in relation to equality and non-discrimination on the political platform of the parties governing the City. The Black Lives Matter mobilisation in the city was a further stimulus. While there had been much discussion of discrimination in the city over the previous decade, a civil society drive for delivery on this issue, rather than just talk, further assisted.

***Process:*** A research team with the necessary expertise was contracted by the Municipality. The research involved a survey, focus groups and workshops involving people from a minority ethnic background. Young people, civil society organisations, employees, agencies, and districts in the city were engaged in the focus groups and in the workshops

The research found high numbers of minority ethnic people reporting discrimination by the Municipality. In this, there was a significant focus on individual level forms of discrimination. However, this output informed the focus on systemic forms of discrimination that emerged in subsequent seminars and discussion on the research, and in action planning in response to the research.

Alongside the research, the municipality sought to establish indicators for the progress to be made on this issue by its services, in achieving the delivery of equal services, and its workplace, in securing a diversity of its employees at all levels. An expert institution was contracted by the municipality to prepare a report on the indicators required. This report encompassed minority ethnic groups, groups based on religion, LGBTI people, and people with disabilities

The process for this report on indicators included a series of workshops that involved agencies and civil society organisations. A framework for indicators was applied that encompassed: celebration of diversity, and making the situation and contribution of minority groups visible, and making the Municipality strategies for diversity visible, to the public and to its employees; competence and training, establishing expectations of managers and employees in this field and bringing this focus into strategic policy documents; and inclusion and protection from discrimination, ensuring effective instruments in place to address this experience.

***Impact:*** This initiative has enabled acknowledgement that discrimination is a problem, on the basis that if so many people recount this experience of discrimination, the municipality is not able to deliver quality services. The initiative has informed a new shared understanding of the issue, with a common language to discuss and respond to the issue. The necessity for action on the issue is seen at senior levels, enabling access to people at this level to discuss the issue and the responses required.

The initiative has brought the municipality to the point of action on the issue. There is an interest in training managers on the issues, and making this training more of an obligation. Action planning is enabling a focus on organisational systems change as being central to the action required. An action plan has been developed on recruitment of leaders, managers, and Board members with a minority ethnic background. There is a requirement that when making plans, the problem is established based on facts, and the planning process involves the population including people of minority ethnic background.

*Key reference document:* Sindre Bangstad, Netta Marie Rønningen, Edvard Nergård Larsen, Tony Sandset and Prisca Bruno Massao, Mapping of Racism and Discrimination Encountered in Oslo Municipality, Report 2022/2, KIFO, 2022 (Norwegian).

**Case study: Provoking debate, enabling understanding and stimulating action through research on structural racism in Bergen, Norway**

***Purpose:*** This research initiative was undertaken by Bergen Municipality to establish how minority ethnic populations perceived the way they were treated by the city's services and how they experienced living in Bergen. There was an interest to capture the narratives of minority ethnic people and to hear their critique.

***Stimulus:*** The primary driver for this initiative was political commitment. The municipality, through its Diversity and Equality Section, was also engaging with the Muslim community on experiences of Islamophobia and this was a further stimulus. The institutional infrastructure of a Diversity and Equality section was also important.

***Process:*** The contracting of an external research team, with expertise in structural racism, was central to the approach taken. Involving this expertise is noted as important for the effectiveness of the initiative. A wider engagement with civil society and minority ethnic communities was engaged in the development of actions resulting from the research findings.

A qualitative aspect to the research involved one-to-one interviews with a small number of minority ethnic people. Securing such first-hand narratives of encounters with the city's services and of living in Bergen, is noted as a politically influential part of the final report. Education services emerged as a particular focus for concern. A quantitative aspect to the research involved a survey of some four hundred minority ethnic people. Employment and the housing rental market emerged as a particular focus for concern.

There were methodological challenges. The COVID-19 pandemic ruled out holding the intended group interviews. Data protection concerns precluded access to the data required to secure a fully representative survey, with respondents subsequently found to be more highly educated than the average.

The distinction between individual and systemic forms of discrimination was not easy to establish. However, the understanding and expertise of the research team on structural racism enabled patterns of racism to be identified from the analysis of interviews and survey findings, that pointed to more systemic forms.

The identification of the focus for the research as structural racism reflected the political commitment to the issue, and gave confidence in the initiative, encouraging participation by minority ethnic people.

***Impact:*** The research report provoked debate. Politicians on the City Council took it seriously, and a number of public meetings on the report were held. There was good media coverage and debate of the report.

The research report enabled understanding of the issue of structural racism, and it has become a reference point for the issue. A specific and accessible theoretical chapter on the issue was included in the report on what the concept of structural racism means in the Norwegian context. This has enabled city officials to operationalise the concept in plans and actions.

The research report has stimulated action and continues to do so. An action plan on discrimination and hatred experienced by Muslim people was published. Funding has been allocated to the education sector to combat racism in a more systematic way, enabling teachers in relation to the issue and increasing awareness. A cooperation of several NGOs, representative of a range of minority groups, has been funded to establish an office to enable low-threshold reporting of discrimination.

*Key reference documents:* Sindre Bangstad, Edvard Nergård Larsen & Lise B.Grung, Structural Racism in Bergen, Report 2021/09, Vista Analysis and KIFO, 2021 (Norwegian).

## 3.3 Engaging communities

Engaging communities is a second strand of targeted equality data initiatives, initiatives which are specifically undertaken to gather data on groups experiencing inequality. This strand focuses in on and works directly with specific groups, which can be a local population (1), a specific group experiencing inequality (2), and/or staff within an organisation (3).

***(1) Focus:*** Local Population

***Purpose:*** Establish a picture of the territorial reality for groups and the gaps that exist between groups, to inform policy and programme development, and decisions on resource investment.

***Nature:*** The local population can be a focus for exploration through processes that can involve:

- research using existing equality data;
- research or survey work to generate new equality data; and/or
- hearings on issues of discrimination and inequality.

This case study is at the local level, but could tailored for replication at the regional and national levels. While this strand of targeted equality data initiatives, when focused on local populations, best fits with the local level, they can be designed to be implemented from the regional or national level. This is most effectively done from a multilevel governance approach based on a programme of linked and coherent gathering and analysing of population data, using territorial units that enable policy and programme responses to the analysis undertaken. Purpose specific to the level of governance undertaking the initiative would need to be established to inform the design of the initiative.

**Case study: Territorial and cultural equity, Montréal, Canada – Population focus**

***Purpose:*** Population data is gathered and analysed to inform and guide the design and implementation of city interventions, ensuring they are as just and intelligent as possible, and orienting action to combat racism and systemic discrimination.

***Structure:*** The Office de Consultation Publique de Montréal (OCPM) published a report in June 2020 on a consultation regarding systemic racism and discrimination in the city. The Commission convened for this consultation, recommended to: collect and publish population data, every three years, of a comparative nature, and differentiated to identify and measure gaps between communities in areas such as employment, public security, housing, culture, and social and economic development.

Implementation of this recommendation is driven by the Office of the Commissioner for the Combat against Racism and Systemic Discrimination, and by the Social Affairs Intelligence and Optimisation Division of the Service for Diversity and Social Inclusion of the city.

***Process:*** Data is understood as the means to respond to a question, they are a means to an end, not an end in themselves. Data gathering is preceded by a mobilisation of knowledge and a gathering of intelligence on social affairs, to enable an accurate definition of the question, and an adequate identification of the data to be gathered. Both data and a culture of data analysis are required, and the administration has to be ready to use the data in pursuit of an inclusive transition. This readiness starts from a vision and political strategy for inclusion.

Five themes are identified as needing to be addressed in an inclusive transition: administration without discrimination; public security without profiling; territorial equity; cultural equity; and inclusive citizenship. Data is noted as one of the seven levers for action on these themes. The other levers noted are: vision and political strategy; governance; organisational practice; communication; an ecosystem of institutional and citizen organisation; and events.

*Key reference document:* Racism and Systemic Discrimination in the competences of the City of Montréal, Office de Consultation Publique de Montréal (OCPM), 2020. (French)

***(2) Focus:*** Specific Groups

***Purpose:*** Establish a shared knowledge and understanding of the situation, experience and identity, or specific needs, of specific groups exposed to inequality and discrimination, with a view to agreed action to address the issues established.

***Nature:*** Specific groups, exposed to inequality and discrimination, can be a focus for mutual learning through processes that can involve:

- direct communication;
- relationship and trust building;
- dialogue;
- joint endeavour; and/or
- partnership building and initiative.

This case study is at the local level, but could tailored for replication at the regional and national levels. While this strand of targeted equality data initiatives, when focused on specific groups, best fits with the local level, they can be designed to be implemented from the regional or national level. Purpose specific to the level of governance undertaking the initiative would need to be established to inform the design of the initiative.

The key element of community engagement would need to be reconsidered at these other levels of governance:

- civil society organisations that are representative of the specific groups, and organised at the level of governance on which the initiative is being taken, would need to be central to the process in bringing the voice and perspective of the group into a participative process.
- local level sampling would be involved to secure grassroots perspective and experience.
- multilevel governance would usefully be involved.

**Case study: The Iroko 7 Cs, Kirklees, UK – Community focus**

***Purpose:*** The Iroko project was developed, over an eight-month period, to respond to a context of: stark inequalities for Black and African Caribbean Communities[24] revealed by the COVID-19 pandemic and Black Lives Matter protests; fractured relationships with these communities that needed repair; and a concern to understand racism as it was being experienced by these communities. It involved:

***Co-production:*** The initiative was designed for learning with the community, not for extracting data from the community. It involved being present in the community, engaging the community where they were at on the issue, and enabling community leadership in the initiative.

***Communication:*** The initiative involved building and strengthening a Community Ambassadors team; on-line community engagement on why collect data, how to collect data, and what data to collect; action planning for the initiative with Black and African Caribbean leaders; and capacity building and leadership training for Black and African Caribbean community members.

[24] Reference terms used in the United Kingdom context. This footnote is also applicable for the rest of the document, each time these reference terms are used.

***Collection:*** The initiative gathered data through an online engagement in four community sessions; three in-person sessions with young people from the community; and three in-person interviews. It engaged with 394 participants and facilitators, aged from 16 years to over 65 years.

***Cultural analysis:*** The initiative involved an analysis of the stories, voices and data gathered to establish themes in relation to the impact of racism, and to identify the systems, from the personal to the public, within which racism was being experienced.

***Cultural humility:*** The initiative allowed for reflection, led by Black and African Caribbean leadership to ensure that it was trust-based and that it engaged all voices. It further allowed for internal reflection through Council staff training to prepare staff to hear and respond to the outcomes of the initiative.

***Council systems:*** The initiative was directed at identifying and effected the change required in Council systems to address and eliminate racism – including systems for planning, service provision, and community engagement.

***Change:*** The initiative influenced Council plans and strategies; improved service provision; and sustained new relationships with the Black and African Caribbean community. The initiative empowered the Black and African Caribbean community to take responsibility; enabled learning; and developed self-determination.

Kirklees Council, Huddersfield University, and Amber & Greene (EDI specialist) implemented the initiative.

*Key reference document:* Kirklees Iroko Project online presence: Project Summary & Iroko Project Trustee.

***(3) Focus:*** Staff

***Purpose:*** Establish and track the diversity of staff within an organisation, with a view to informing recruitment, promotion and workplace policies and initiatives that can achieve this diversity, recognise this diversity and respond appropriately to this diversity.

***Nature:*** Staff members are a focus for engagement on diversity within an organisation, and issues of inequality and discrimination can be explored through processes that can involve:

- communication and trust building;
- engagement with staff networks and individual staff members; and/or
- survey and research initiatives.

While this case study is at the regional level, it can very immediately be replicated at the local and national levels. This strand of targeted equality data initiatives, when focused on staff, fits best at whatever level the organisation involved is located. The design and implementation of the initiative will reflect the nature of the organisation and the level(s) of governance it encompasses.

**Case study: The administration as exemplar, Canton (state) of Neuchâtel, Switzerland – Staff focus**

***Purpose:*** The initiative is focused on staff diversity within the administration. It responds to an ambition of the administration to be an exemplar in its approach to equality and openness to diversity, and seeks to develop an organisational culture that encompasses inclusion and diversity and enables necessary structural changes.

***Foundation:*** This initiative is rooted in the "Roadmap for an Administration that is Open to Diversity and Egalitarian" approved by the Canton (state) of Neuchâtel in 2018. A Working Group to progress an action plan for this roadmap is made up of representatives of state services, including: human resources

department; statistics department; communications department; Office for Family Policy and Equality; and multicultural cohesion service. The full Council of State supports this work.

***Staff survey:*** A survey questionnaire was developed and applied among staff, with the involvement of Université de Neuchâtel, in order to capture the diversity of staff within the administration. The university was involved to ensure staff confidence in, and participation in, the initiative. The questionnaire encompassed three axes: profile of employees; work-life balance for employees; and experiences of racism and/or other forms of discrimination. The staff profile encompassed place of birth, nationality, country of origin of parents, language, age, gender (including non-binary), and childcare responsibilities. Sexual orientation was not listed in the questionnaire but will be a focus for action.

There was a 46% response rate from an overall staff of 5,314. There was diversity found among employees, but a large majority were Swiss citizens. A significant level of discrimination was noted on the basis of gender, age, origin, and physical appearance. The Université de Neuchâtel prepared a report on the findings, while respecting confidentiality of respondents. This was communicated both internally and externally.

***Taking action:*** The survey informs an action plan to be approved by the Canton (state) of Neuchâtel. The actions in this plan are to be prioritised and their implementation monitored.

In terms of change of a systemic nature, there is a commitment to review internal policies and documents and the manner in which they reference and respond to diversity and inclusion objectives. An ethics/diversity charter is to be prepared. Recruitment processes are to be a particular focus, including training for personnel involved. Staff induction is to include a focus on the administration's commitment to diversity and its zero tolerance for discrimination.

There is a challenge to engage in communication of the report among staff to create the conditions for implementing the action plan. Staff need to buy into the change required and planned and should be enabled to be active participants in this change. The report was communicated by email to all state employees, communicating the ambition being pursued to be an exemplar and to improve the representativeness of diversity among staff.

The Working Group is considering which elements of the report are to be included as indicators in the monitoring of the overall Roadmap. This first survey is to serve as a baseline with the exercise repeated every four years, to coincide with the term of office of the legislature.

*Key reference document:* Ruedin D. & Fehlmann J., Panorama de la diversité au sein du personnel de l'administration du Canton de Neuchâtel, SFM Studies # 79, Université de Neuchâtel & République et Canton de Neuchâtel, 2022. (French)

## 3.4 Food for thought

1. Your organisation, at its particular level of governance, is concerned with the inequalities experienced by a number of minority ethnic groups in the field of employment. It has committed to implement a targeted equality data initiative that involves community engagement to investigate the nature and scale of these inequalities and to establish effective responses.

- What steps would you take in preparing for this initiative? How would you go about implementing the initiative? What would you do with the results of this initiative?

2. Your organisation, at its particular level of governance, is concerned to track, monitor and respond to incidents and experiences of discrimination for a range of groups. It has decided to establish an observatory institution to meet this ambition.

- What mandate would you give to this observatory? How would you structure this observatory, keeping in mind any particular challenges due to the level of governance at which it is being established? What initiatives would you want this observatory to take?

## 3.5 Quiz

Question 1. What are targeted equality data initiatives?

A. Initiatives that target a particular issue.
B. Initiatives that target a particular group.
C. Initiatives that gather specific equality data for a specific purpose.

Feedback: C best hits the mark.

These equality data initiatives can target a particular group or they can target a particular issue or they can do both. However, the term tries to capture that these are initiatives separate from the more general data gathering of an organisation, which should be disaggregated to capture groups experiencing inequality, and are often initiatives to address limitations or gaps in these more general data gathering systems.

Question 2. What is the key purpose of a targeted equality data initiative focused on the staff of an organisation?

A. Inform human resource policies.
B. Establish the diversity of staff.
C. Capture staff perspectives.

Feedback: A best hits the mark.

Purpose is key to targeted equality data initiatives, but this is purpose that leads to positive change for those who are the focus for such initiatives. The initiative might well establish the diversity of staff and capture their perspectives, but purpose combined with positive change point to A as the answer.

Question 3. What does a developmental approach to targeted equality data initiatives involve?

A. Trust building; group involvement; co-production; and mutual learning.
B. Capacity building for the targeted and opportunities for learning, and support for acting on the issues identified.
C. Strengthening and building the capacity in the organisation to better respond to the issues identified.

Feedback: A best hits the mark.

The developmental approach is focused on the relationship between the organisation and the group that is a focus for the initiative. This does not preclude that such initiatives would build the capacity of the organisation involved and of the group involved in different ways, but this is not the primary concern of a developmental approach to targeted equality data initiatives.

## 3.6 Checklist

In developing a targeted equality data initiative to support action on systemic discrimination, have you explored and identified the most appropriate options to take?

This is the case if:

- ☐ The purpose of your initiative has been explored and defined in terms of:
  - empowerment: engaging with the particular community that is subject for the targeted initiative in a developmental approach of mutual learning; and
  - organisational change: establishing an informed picture of the situation, experience, and identity, or specific needs, of groups exposed to inequality and discrimination, to inform organisational change in priorities and processes.

- ☐ The most appropriate focus for your initiative has been explored and established, whether on:
  - area-based populations;
  - specific groups exposed to inequality and discrimination; or
  - staff of an organisation.

- ☐ The most effective type of initiative has been explored and selected, whether through:
  - building a knowledge base; or
  - a process of community engagement.

- ☐ A developmental approach has been established for your initiative, with action taken to:
  - build trust;
  - support leadership and involvement from the group concerned;
  - achieve co-design and co-production of the initiative; and
  - establish mutual learning as the objective.

## 3.7 Reference documents

In relation to targeted equality data initiatives - Knowledge building:


ECRI GENERAL POLICY RECOMMENDATION No. 4 on National Surveys on the Experience and Perceptions of Discrimination and Racism from the Point of View of Potential Victims, Adopted on 6 March 1998, CRI(98)30.

Barcelona Discrimination Observatory Report 2021, Barcelona City Council, 2022.

Sindre Bangstad, Netta Marie Rønningen, Edvard Nergård Larsen, Tony Sandset and Prisca Bruno Massao, Mapping of Racism and Discrimination Encountered in Oslo Municipality, Report 2022/2, KIFO, 2022 (Norwegian).

Sindre Bangstad, Edvard Nergård Larsen & Lise B.Grung, Structural Racism in Bergen, Report 2021/09, Vista Analysis and KIFO, 2021 (Norwegian).


In relation to targeted equality data initiative - Community Engagement:


Racism and Systemic Discrimination in the competences of the City of Montréal, Office de Consultation Publique de Montréal (OCPM), 2020. (French)

Kirklees Iroko Project online presence: Project Summary & Iroko Project Trustee.

Ruedin D. & Fehlmann J., Panorama de la diversité au sein du personnel de l'administration du Canton de Neuchâtel, SFM Studies # 79, Université de Neuchâtel & République et Canton de Neuchâtel, 2022.

# 4. Module three: An equality data strategy

This module examines and explores the development and implementation of equality data strategies. It first establishes the aim and focus of equality data strategies and the cross-institutional approach they require. It then examines each of the key steps involved in such an approach. Finally, it explores the challenges to be met for effective equality data strategies, before presenting two exemplars.

## 4.1 Institutional approach

***Aim and focus for an equality data strategy***

An equality data strategy enables and secures the ongoing and systematic collection, analysis and use of equality data to inform and shape policy and programme development.

Such a strategy generates a key evidence base for policy and programme development. It enables development and impact assessment of policies and programmes at the design stage in relation to ensuring their impact on equality and outcomes for groups exposed to discrimination. It underpins a capacity to monitor trends over time for different groups in society and it makes issues of systemic discrimination visible.

An equality data strategy has a particular focus on data in relation to the situation of groups exposed to inequality, in terms of disadvantage in the level and quality of resources the group can access, and of outcomes resultant from this.

The institutional approach to developing and implementing an equality data strategy engages all relevant stakeholders in the development and implementation of an equality data strategy. It involves multi-stakeholder dialogue and initiative. This underpins the participative nature of the initiative.

***Approach in developing and implementing an equality data strategy***

There are four phases to the development of an equality data strategy: convening the stakeholders (1); auditing the current sources of equality data (2); presenting the available equality data in an accessible manner (3); and deploying the equality data as a part of the policy cycle (4).

*(1) Convene*

Stakeholders can be convened in a working group format to drive the development and implementation of an equality data strategy. The working group format enables co-creation, cooperation, and coordination to shape this process. It promotes coherence and consistency of initiatives in this field, as well as knowledge and resource sharing, best-practice exchange and mutual learning.

Leadership in convening the working group can come from a range of sources. At a national level, leadership can come from the relevant national statistics authority or a national Government ministry. The equality body can also play a key role. At a regional level, leadership can come from a regional Government department or a regional statistics authority. At a local level, leadership can come from a local or municipal authority. Key stakeholders involved in the working group, at whichever level it is convened, encompass relevant public bodies, statistic agencies, research institutions, academia, equality bodies, and civil society organisations.

Adequate conditions are purposefully created for the effective and successful functioning of the working group. Initiatives in this regard can include:

- strengthening the relations of trust between the individual members of the working group, and their commitment to the joint endeavour;
- mobilising and investing resources in the activities required;
- building capacity through mutual learning in the working group, enabling all stakeholders to see and understanding their role and contribution, and providing training to strengthen necessary skills and awareness within the participating organisations; and
- ensuring coherence and comparability in equality data collection and analysis where different organisations are involved in its collection.

*(2) Audit*

An audit can be conducted to identify and review existing sources of equality data, at the level for which the equality data strategy is being developed and implemented. The audit would identify data sources in terms of:

- the institutions involved;
- the discrimination grounds covered;
- the policy domains addressed; and
- the nature and quality of the data gathering process.

The audit would be supported by the working group. It would be implemented by the member(s) of the working group that are best placed to gather the information required. The process would include: establishing knowledge already held by members of the working group; survey initiatives; and interviews with relevant personnel.

The information gathered would be reviewed to establish issues and/or gaps in the equality data gathered. These could then be a focus for recommendations to the relevant entities and for future planning by the working group.

The information gathered in the initial audit would be updated by the working group, preferably on an annual basis.

*(3) Present*

An online equality data hub would be established by the working group and hosted by the most appropriate member(s). This would set out the information gathered in the audit, make accessible the various sources of equality data identified, and provide a review of the equality data available. It could provide a wider range of materials to resource an understanding of the importance of equality data and the requirements for its effective collection and analysis.

The equality data hub would be updated on an ongoing basis by the working group as new sources are identified or emerge.

*(4) Deploy*

Equality data is collected for a purpose and it is important to focus on the ongoing use of the equality data gathered under the equality data strategy. This would ensure its use by the relevant institutions across all policy domains, in the policy cycle of: policy-thinking, policy making, policy implementation, and policy monitoring and evaluation.

The working group could engage in promotional activities to ensure an ongoing and appropriate use of the equality data made available. This would involve securing an engagement with the equality data hub by these policy institutions across the various policy domains. Activities could include:

- the development and dissemination of regular briefing material on equality data, its availability and its deployment in the policy process; and
- seminar events with a focus on equality data and generating discussions on the collection, analysis and use of equality data among relevant institutions.

***Multilevel governance***

An equality data strategy can be developed and implemented at any level of governance: national, regional, or local. It could also be pursued as a multilevel initiative embracing all these levels.

Whatever level of governance an equality data strategy is initiated at, the learning from that experience could usefully be made available to other levels of governance to:

- promote and enable a wider uptake of such an approach; and
- create the conditions for a multilevel approach.

A multilevel approach would involve and enable:

- coordination in the range of sources of equality data developed and made available;
- mutual learning in relation to the gathering of equality data and to their deployment in preventing and addressing systemic discrimination; and
- exchange of practice and perspective between the different levels of governance to inform innovation and to enable peer support.

***Challenges in developing and implementing an equality data strategy***

A long-term coordinated approach is needed for an effective equality data strategy. This involves a focus both on evolving and sustaining the collection and analysis of equality data, and on the effective deployment of this equality data in policy-thinking, policy making, policy implementation, and policy evaluation.

Legal frameworks that relate to personal data collection are not well known or understood. There are misconceptions as to the barriers posed by such legislation, which can limit equality data collection (see section 2.3 above). Capacity building and information provision in this regard is therefore important.

An adequate and appropriate focus on all groups experiencing inequality is required in the collection and analysis of equality data. Within this comprehensive focus, there is the challenge of adequately attending to intersectionality and the situation, experience, and identity of those people at the intersections between these groups.

## 4.2 Developing an equality data strategy

There are recent exemplars available for developing an equality data strategy. Exemplars from Ireland and Belgium are presented, each of which follow a similar approach. In both cases the independent equality and human rights body played a central role. Both exemplars are at an advanced stage.

The two case studies presented below are located at the national level. They can be replicated at the local and regional levels, as the overall approach would be identical at whichever level. The level of governance at which an equality data strategy is developed will influence:

- the specific stakeholders to be engaged;
- the particular institutions that will make use of and deploy the equality data to prevent and address systemic discrimination; and

- the identification of current sources of equality data.

***Case Study One***

The Irish Human Rights and Equality Commission (IHREC), the Irish equality body and national human rights institution, played a central role in the emergence of a working group on equality data at a national level, with work progressing on an equality data strategy. The case study is presented to reflect the phases of convening, auditing, presenting, and deployment to the extent these have been completed.

**Case study: Creating the conditions for an equality data strategy in Ireland**

Equality data is of critical importance and significant interest to all those involved in this initiative. It is required to feed into the policy cycle to enhance evidence-based policy making in all relevant policy areas, addressing all the different discrimination grounds. The policy cycle encompasses policy thinking and public debate, the initial design of measures and policies, the implementation of policy measures, and the monitoring and evaluation of their impact.

**Convening**

Equality data is a public good, and as such is beyond the scope of any one organisation to develop and sustain. Collective effort and inter-institutional cooperation is required to realise this public good, and deploy it to identify and prevent systemic discrimination.

The national Equality Data Strategy Working Group reflects such an approach. It includes representation from public bodies, government departments, the Irish Human Rights and Equality Commission (IHREC), statistics organisations, research institutes and a civil society organisation. It is co-chaired by the Department of Children, Equality, Disability, Integration and Youth and the Central Statistics Office, with both sharing the secretariat.

The working group meets regularly to draft the Strategy. The plan is to develop a draft equality data strategy in 2022, and send it to the government, with publication envisaged in 2023.

Alliance building involved the mapping of relevant stakeholders and drivers for equality data, national and local, and the drawing together of these stakeholders behind a common endeavour, and the securing of their commitment to this. The Working Group emerged from this activity. The focus on common endeavour was viewed as important in securing participation, as there was a concern that some stakeholders would be left with full responsibility for delivery of a complex initiative.

The IHREC, as an 'honest broker', held bilateral meetings with key stakeholders such as the Central Statistics Office, government officials, research institutes and civil society organisations to understand their views on equality data and what they needed to move this agenda forward. The IHREC was able to present the stakeholders with a menu of institutional and structural, and operational activities from its work on this issue of equality data at European and national levels, to frame and structure dialogue and planning.

In building alliances for equality data, it was important to create space for the stakeholders to understand 'each other's worlds' and the contributions each had to make and the opportunities each could offer. The tone for engagement has to be collegial, appreciative, respectful, non-judgemental, and fun. There were opportunities to showcase work, to develop professional knowledge and skills, and to extend professional networks.

The IHREC convened an equality data event, where members of the EU Equality Data Subgroup talked through the Guidelines developed, and discussed how they had developed equality data, sharing real world experiences. Partner organisations in Ireland, from the Working Group, met their counterparts

from other organisations to share ambitions and concerns and identify challenges in moving forward on this issue.

**Auditing**

The Central Statistics Office undertook an equality data audit in 2020 using the tool developed by the EU Equality Data Subgroup. The audit provides an agreed baseline for talking about the state of equality data. This was based on the 'Equality Data Diagnostic Mapping Tool', available on the website of the EU Agency for Fundamental Rights.[25]

The audit identified issues in that: only two datasets routinely and systematically collect data on the 'Race ground' as defined in Irish equality legislation; another 24 datasets which were marked as covering the 'Race ground', as defined in Irish equality legislation, actually only contain nationality or ethnicity data; membership of the Traveller Community appears only in 12 datasets; and there are significant data gaps in relation to sexual orientation and religion.

**Presenting/Deploying**

Establishing where the partner organisations on the working group want to take this initiative is essential, as the development and ongoing implementation and evolution of an equality data strategy can be a long road. This vision is mapped out through real world planning and a focus on institutional and operational change.

Institutional change encompasses inter-institutional cooperation on equality data, an equality data hub, capacity building, and effective use of equality data collected.

Operational change encompasses data collection, securing comprehensive and representative equality data collection, mainstreaming a focus on equality data in surveys undertaken, and validity, reliability and comparability of data collected.

*Key reference document:* Equality Data Audit, 2020, Central Statistics Office, Ireland.

***Case Study Two***

Unia, an equality body and national human rights institution in Belgium, played a lead role in a project that has enabled the development of an equality data hub and created the conditions for an equality data strategy at national level, with local level perspectives.

The initiative involves a national governance level equality data strategy. However, there has been an engagement from the Brussels-Capital Region with a view to developing a regional level equality data strategy based on this approach.

The case study is present to reflect the phases of convening, auditing, presenting, and deployment to the extent these have been completed.

**Case study: Improving equality data collection in Belgium**

The equality data strategy responds to the imperative for a precise picture of reality, an evidence base, to be available if policy solutions to inequality are to be effectively designed and advanced.

**Convening**

[25] Available at: Compendium of Practices on Equality Data | European Union Agency for Fundamental Rights (europa.eu).

Unia, an equality body and a national human rights institution in Belgium, in partnership with the Equal Opportunities Team of the Federal Public Service for Justice, implemented an initiative to improve the use and collection of equality data in Belgium.

The participatory approach taken involved public institutions, civil society organisations, and universities in an advisory committee. A survey and interviews with experts to gather information on equality data sources further expanded this participation.

**Auditing**

A mapping of existing equality data sources was the first key output of the project. A survey and interviews were deployed to establish an overview of existing equality data sources in Belgium.

A report was then prepared. This analysed the mapping exercise to identify gaps in data sources, and made recommendations for further steps required.

**Presenting**

An online equality data hub was developed to centralise the equality data sources identified and to make them more accessible to the broad public and relevant stakeholders. This allows for an easy and accessible search of these equality data sources by:

- different criteria: nationality, skin colour, origin/migration history/descent/other racial criteria, religious/philosophical beliefs, sexual orientation, gender identity, gender expression, and sex characteristics.
- different domains: employment, education, health, housing, justice and police, media, and other.

**Deployment**

Deployment involves steps to

- use the data hub: this involves putting the data sources into action across all domains and categories.
- update the data hub: newly published sources must be included; the range of categories covered needs to be expanded, such as disability; and attention needs to be given to intersectionality.
- create more awareness about the legal framework for equality data collection.

There is a need to develop a long-term coordinated approach to equality data collection, including the establishment of a consultative body on equality data to: develop a coordinated and structural strategy; provide a meeting point for data producers and users across public institutions, academia and civil society; and sustain the participative approach.

The minimal conditions for equality data collection need promotion: respect for privacy, participation of the groups concerned, precise purposes, appropriate methods, ensuring transparency, being accountable, building and maintaining trust, and self-identification as a goal.

*Key reference documents:* Online data hub available at: https://www.equalitydata.unia.be/nl/. Project report (Fr): Final Report: Improving equality data collection in Belgium, Unia & Federal Public Service for Justice, 2021.

## 4.3 Food for thought

Your organisation, at its particular level of governance, is preparing to implement an equality data strategy.

- Which organisations would you involve in a working group for the strategy, who would take leadership roles, and what steps would you take to ensure collegiality within the group?

## 4.4 Quiz

Question 1. What is the key purpose of an equality data strategy?

A. Influence and inform the policy-making cycle.
B. Generate a better picture of the situation of those experiencing inequality.
C. Improve organisational data systems for monitoring and reporting purposes.

Feedback: A best hits the mark.

The core purpose for an equality data strategy is a better-informed policy cycle, such that it can be free from any traces of systemic discrimination. Improved knowledge of the situation of different groups is important, but this knowledge needs to be put to use. Improved data systems are important, but it is necessary to look beyond monitoring performance to improving performance when it comes to systemic discrimination.

Question 2. What does an institutional approach to an equality data strategy involve?

A. Informed and active engagement of senior management within the institution developing the equality data strategy.
B. Leadership by those responsible, investment of resources, and organisational commitment.
C. Broad involvement of organisations; a multi-stakeholder structure; and joint initiatives.

Feedback: C best hits the mark.

Senior management commitment is important, but an equality data strategy will inevitably involve more than any one organisation or sector. Leadership, resources, and organisational commitment are needed, but fail to capture the joint initiative involved in an equality data strategy and the imperative of building effective multi-stakeholder involvement.

Question 3. What are the key steps in an equality data strategy?

A. Development, publication, and deployment of the steps required to gather and analyse equality data.
B. Convene stakeholders; audit data sources; make current sources accessible; and ensure they are used.
C. Identify those with responsibility and mandate to collect population data and require them to do so in a manner that is disaggregated by those groups experiencing inequality.

Feedback: B best hits the mark.

Yes, an equality data strategy would be developed, published and made use of, but this does not capture the different phases that are involved and the need to think through how best to approach each of these phases. Yes, those with responsibility

for data collection do need to further develop their capacity to disaggregate the data they produce, but this does not capture the diverse contributions to be made by different organisations from across a range of sectors, to developing and implementing an effective equality data strategy.

## 4.5 Checklist

In developing an equality data strategy to support action on systemic discrimination, have you planned for all necessary steps?

This is the case if:

- ☐ A broad range of relevant stakeholders are convened and enabled to cooperate and coordinate their actions in developing and implementing the equality data strategy.
- ☐ The full range of existing equality data sources are audited and reviewed for comprehensiveness, representativeness, and comparability, with recommendations made to address gaps and issues.
- ☐ Existing equality data sources are made available and accessible, through an equality data hub, to with responsibilities for policy thinking, policy making, policy implementation and policy evaluation.
- ☐ Equality data available are made use of by those organisations involved in policy thinking, policy making, policy implementation and policy evaluation.

## 4.6 Reference documents

In relation to the development of equality data strategies


Equality Data Audit, 2020, Central Statistics Office, Ireland.

Final Report: Improving equality data collection in Belgium, Unia & Federal Public Service for Justice, 2021.

Belgian online data hub: https://www.equalitydata.unia.be/nl/.

# 5. Finish

Congratulations on completing this training. Hopefully you have found it useful and inspiring for your work, and in particular for your interest in preventing and addressing systemic discrimination.

The collection and analysis of equality data is a key starting point for preventing and addressing systemic discrimination. This is an urgent challenge given the prevalence of this issue, and given how it undermines any ambition for inclusion.

It is hoped that you can make use of the knowledge, ideas, and links in this training manual in developing targeted equality data initiatives and/or equality data strategies. It might be useful to open up this possibility by:

- establishing what actions are being taken in your organisation to strengthen the collection, analysis and use of equality data, and/or what gaps there might be in this regard;
- identifying the personnel within your organisation that might have a role to play and an interest in taking action to address systemic discrimination and to initiate this through work on equality data collection; and
- establishing a working group to identify the purpose of taking action on equality data, and the type of equality data initiative that might best fit this purpose.

We wish you well in this vital endeavour!

# Appendix: INTERCULTURAL GLOSSARY

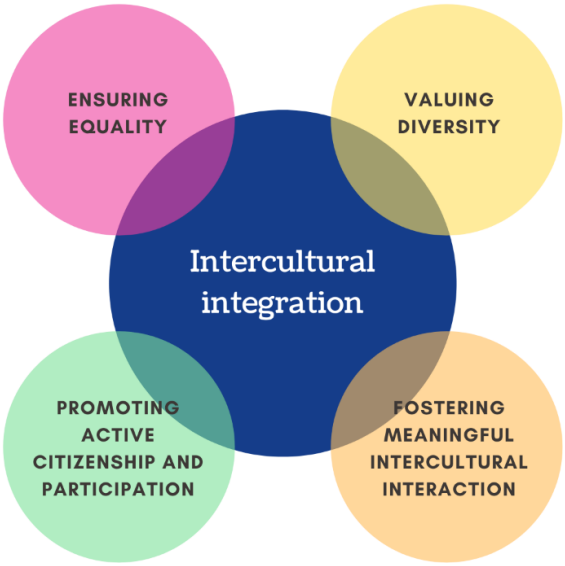
This glossary aims at fostering a shared and consistent understanding of the principles linked to intercultural integration. Definitions stem from key resources produced over the past years by the Council of Europe, may it be by the Intercultural Cities (ICC) programme, the Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI) or other Council of Europe entities. These resources include in particular the *Model framework for an intercultural integration strategy at the national level*, adopted by the CDADI in June 2021, the *Recommendation CM/Rec(2022)10 of the Committee of Ministers to member States on multilevel policies and governance for intercultural integration*, adopted by the Committee of Ministers of the Council of Europe on 6 April 2022, and various ICC *thematic papers*. Unless specified otherwise, the definitions included below stem from one or several of these Council of Europe resources. They are not meant to build a normative basis and are shared for the purpose of common understanding.

## GET STARTED: INTERCULTURAL INTEGRATION

**Intercultural integration**: Intercultural integration is a two-way process involving individuals, communities of individuals, and the society as a whole. It consists of effective, positive and sustainable diversity management policies, aiming to help society to benefit from the potential of diversity and manage its complexities, on the basis of reciprocal and symmetrical recognition, under an overarching human rights framework. The "intercultural integration" model requires a holistic approach which can guide co-ordinated and long-term policies in all fields and levels of governance in order to promote and ensure equality for all members of society, to foster a common pluralistic sense of belonging through valuing diversity and building social trust, community cohesion and meaningful interaction between people across their different socio-cultural backgrounds, and to facilitate their equal participation in and contribution to society.[26] As a model, intercultural integration is based on four fundamental components: Equality, Valuing diversity/Diversity advantage,

(Fostering) Meaningful **intercultural interaction:** is any constructive encounter in a social setting between individuals or groups from different cultures and lifestyles in an atmosphere of mutual respect, understanding and cooperation. Intercultural policy speaks of 'meaningful interactions' between different cultural or ethnic groups, which recognise both the differences and similarities between such groups/individuals, promote the atmosphere of mutual respect, understanding and cooperation, and counter the tendency towards self-segregation. Meaningful interactions are those that take place on equal terms, be they challenging or positive, and which should ultimately be fulfilling for all involved, advancing common goals. Fostering meaningful intercultural interaction through public policies is about creating conditions for positive and constructive everyday encounters across people of different backgrounds and lifestyles in a climate of mutual respect, understanding and co-operation., and Promoting active citizenship and participation

[26] Recommendation CM/Rec(2022)10 of the Committee of Ministers to member States on multilevel policies and governance for intercultural integration (Adopted by the Committee of Ministers on 6 April 2022 at the 1431st meeting of the Ministers' Deputies).




**Equality*:*** refers mainly to the state of being treated equally, whether before the law, in policy or in practice. This includes equal enjoyment of human dignity and fundamental human rights, and equal access to services and opportunities. More broadly, equality of life chances (or 'access') can be distinguished from equality of outcomes, with different political and economic philosophies putting differing emphases on each end of this spectrum. Within interculturalism, equality is most closely linked to the principles of non-discrimination and inclusion, and there is particular attention paid to equity: that is, allocating resources and opportunities to each person, according to their circumstances and needs, in order to obtain a more equal outcome.[27]

**Diversity:** (in this context) is a range of human features which make individuals differ from one another in various ways, some but not all of which are characteristics protected by human rights law. Aspects of identity such as age, sex, gender identity, ethnicity, nationality, sexual orientation, mental and physical abilities, social class, education, economic background, religion, work experience, language, geographic location, political opinion, or family status, are among the sources of diversity.

**Valuing diversity/Diversity advantage:** is the idea that diversity can bring benefits for organisations, communities and businesses, making societies more resilient and successful, when managed with competence and in the spirit of inclusion. This can happen when diversity is considered an asset, to be promoted and included in all decision-making processes. Promotion of diversity is not a singular action but represents a vision and a philosophy of governance.

**(Fostering) Meaningful intercultural interaction:** is any constructive encounter in a social setting between individuals or groups from different cultures and lifestyles in an atmosphere of mutual respect, understanding and cooperation. Intercultural policy speaks of 'meaningful interactions' between different cultural or ethnic groups, which recognise both the differences and similarities between such groups/individuals, promote the atmosphere of mutual respect, understanding and cooperation, and counter the tendency towards self-segregation. Meaningful interactions are those that take place on equal terms, be they challenging or positive, and which should ultimately be fulfilling for all involved, advancing common goals. Fostering meaningful intercultural interaction through public policies is about creating conditions for positive and constructive everyday encounters

[27] Manual for the design of a training course on intercultural competence, Council of Europe, 2022.

across people of different backgrounds and lifestyles in a climate of mutual respect, understanding and co-operation[28].

**Promoting active citizenship and participation**: active citizenship and participation occur when stakeholders (all citizens, including foreign residents where appropriate) have the right, the means, the space, the opportunity and the support to freely express their opinions and influence decision-making on matters that affect them. In some situations, participation may mean those who are directly affected taking the lead and driving the process. Intercultural participation requires an equal and respectful basis, in which everyone feels heard, and involves tackling obstacles that may hinder certain stakeholders' active participation.

**Discrimination:** (in this context) is unjustifiably different (distinctive, exclusionary, restrictive, preferential) behaviour towards and/or treatment of certain persons or groups, based on traits of the person or on particular characteristics of the group. Discrimination is generally understood as differentiation which causes harm and is distinguished from prejudice and stereotyping by being an action or outcome of those attitudes.

**Systemic discrimination:** occurs where the procedures, routines and organisational culture of any organisation contribute to unequal outcomes for minority groups compared to the general population.

**Equality data:** Any piece of information that is useful for the purposes of describing and analysing the state of equality. The information may be quantitative or qualitative in nature. The main focus is on equality statistics, by which are meant aggregate data that reflect inequalities or their causes or effects in society. Sometimes data that are collected primarily for reasons other than equality-related purposes can be used for producing equality data if adequately disaggregated.[29]

## OTHER RELEVANT DEFINITIONS

**Intercultural society**: a community of people with diverse backgrounds that values diversity as a collective advantage and aims to afford equal rights and opportunities for everyone by creating the conditions for full and active participation based on a common set of values, a shared sense of belonging, and a pluralist collective identity. The public authorities actively combat prejudice and discrimination and ensure equal opportunities for all by adapting their governance structures, institutions and services to the needs of a diverse population, without compromising the principles of human rights, democracy and the rule of law. They adopt participatory approaches and multilevel governance to develop a range of policies and actions to encourage mixing and interaction across differences and to stimulate the participation of all residents in social life and decision that affect their everyday life and environment. The high level of trust and social cohesion helps to prevent conflicts and violence, increases policy effectiveness and make the territories attractive for people and investors alike.

**Intersectionality:** the concept of intersectionality recognises that each individual has a complex identity which makes them unique. It is highly unlikely, therefore, that they will think of themselves as defined entirely by one aspect of their make-up. An individual from a minority background may

[28] Model framework for an intercultural integration strategy at the national level: Intercultural integration strategies, managing diversity as an opportunity, Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI), Council of Europe, 2021.

[29] Makkonen T., European Handbook on Equality Data, DG Justice and Consumers, European Commission, 2016.

experience exclusion or stigmatisation by their ethnicity, their gender, their perceived sexual orientation or some combination of these. More positively, this complexity of identity allows identifications to be made with other individuals, for example on gender grounds, which cross social dividing lines. [30]

**Prejudices:** preconceived attitudes towards a group or its members, untested and therefore unjustified by evidence. While there are both positive or negative biases, the term 'prejudice' has a generally negative connotation, since prejudices do harm and injury. Very often they are closely related to a sense of belonging (or not) to groups and the roles individuals are supposed to have within them, thus altering the ability of the target group to self-identification. They are associated with emotions such as dislike, mistrust, fear, or even hatred. They do not allow us to see others as individuals, nor to recognise diversity among the members of a stereotyped group.

**Intercultural competence:** The ability to understand and respect each other across all types of cultural barriers. Intercultural competences refer to the set of knowledge and skills necessary for people and organisations to act in an intercultural way in diverse societies.

**Multilevel governance:** Multilevel governance Is a model of governance which embraces central, regional and local governments, as well as civil society organisations. The ways in which it is organised may vary greatly from one country to another. Ideally, it includes a bottom-up element and implies the setting up of participatory processes for policy co-creation, co-operation and co-ordination among all relevant public authorities, at all levels of governance, and with all relevant stakeholders, in areas of shared competence or common interest. [31]

**Participation in decision-making:** the vertical process of multilevel governance must be complemented by a horizontal process of public participation, in the design, delivery and evaluation of intercultural integration plans. Such participation, by individuals and through non-governmental organisations, is essential to match the complexity of the "diversity of diversity", to engender a sense of stakeholding, especially on the part of individuals and organisations of minority backgrounds, and to gain widespread public buy-in to intercultural integration plans.[32]

**Migrant:** At international level, no universally accepted definition for "migrant" exists. The United Nations International Organization for Migration (IOM) has developed a definition for its own purposes that is not meant to imply or create any new legal category. According to that definition, migrant is an "umbrella term, not defined under international law, reflecting the common lay understanding of a person who moves away from his or her place of usual residence, whether within a country or across an international border, temporarily or permanently, and for a variety of reasons. The term includes a number of well-defined legal categories of people, such as migrant workers; persons whose particular types of movements are legally defined, such as smuggled migrants; and those whose status or means of movement are not specifically defined under international law, such as international students."[33] In the past, migration tended to be a once-and-for-all move whereby the

[30] Model framework for an intercultural integration strategy at the national level: Intercultural integration strategies, managing diversity as an opportunity, Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI), Council of Europe, 2021.

[31] Recommendation CM/Rec(2022)10 of the Committee of Ministers to member States on multilevel policies and governance for intercultural integration (Adopted by the Committee of Ministers on 6 April 2022 at the 1431st meeting of the Ministers' Deputies).

[32] Model framework for an intercultural integration strategy at the national level: Intercultural integration strategies, managing diversity as an opportunity, Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI), Council of Europe, 2021.

[33] See: International Organization for Migration, *Glossary on migration*, IML Series No. 34, 2019, available here.

migrant lost touch with their country of origin and attempted to make a home for themselves in their country of adoption. In a more globalised and individualised world, migration is often better thought of as mobility: it may involve more than one move and need not imply, given today's technology, becoming cut off from family.[34]

**Minority:** Considered in the broader sense, i.e. not referring exclusively to national minorities protected under the Council of Europe Framework Convention for the protection of National Minorities, the term "minority" refers to a group which is numerically inferior to the rest of the population of a State and in a non-dominant position.[35]

**Refugee:** The refugee definition can be found in Article 1.A of the 1951 Refugee Convention and regional refugee instruments (including the Organisation of African Unity or the 1984 Cartagena Declaration), as well as UNHCR's statute:[36] A refugee is someone who, "owing to well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it".

States have a mandatory requirement to accept a well-founded claim for refugee status from any individual seeking asylum at or after entry, under the 1951 United Nations Refugee Convention and its 1967 protocol.[37] In particular, they are obliged to comply with the principle of *non-refoulement*, by receiving and assessing such claims on their individual merits, rather than turning away asylum seekers at their borders.[38]

[34] Krings T., Moriarty E., Wickham J., Bobek A. and Salamońska J. (2013), *New mobilities in Europe: Polish migration to Ireland post-2004*, Manchester University Press, Manchester.
[35] Intercultural Cities Key Terminology, Council of Europe.
[36] Convention and Protocol Relating to the Status of Refugees.
[37] See: www.unhcr.org/uk/1951-refugee-convention.html.
[38] It is worth noting that the 1954 Convention relating to the Status of Stateless Persons establishes the legal definition for stateless persons as individuals who are not considered citizens or nationals under the operation of the laws of any country. A person's citizenship and nationality may be determined based on the laws of a country where an individual is born or where her/his parents were born. A person can also lose citizenship and nationality in a number of ways, including when a country ceases to exist or a country adopts nationality laws that discriminate against certain groups. See for reference: www.unhcr.org/statelessness.html.