

Royal College of Nursing submission to the Race Disparity Unit of the Cabinet Office's Consultation on Standards for Ethnicity Data

Responses provided via online survey.

4. If you collect, analyse or report on ethnicity data, please tell us about it here.

RCN ANSWER:

With a membership of close to half a million registered nurses, midwives, health visitors, nursing students, nursing support workers and cadets, the Royal College of Nursing (RCN) is the voice of nursing across the UK and the largest professional union of nursing staff in the world. RCN members work in a variety of hospital and community settings in the NHS and the independent sector. The RCN promotes patient and nursing interests on a wide range of issues by working closely with the Government, the UK parliaments and other national and international political institutions, trade unions, professional bodies, and voluntary organisations.

The RCN is a membership organisation, trade union and professional body. To help provide a service to our members and customers the RCN collects and processes personal information including ethnicity data. This data is requested and stored to ensure that services are meeting the needs of all our members and customers.

Members and customers are asked to self-report their ethnic group at the time of joining or registering with the RCN website or via the Membership contact centre; if this information is not disclosed at the time of joining, they are able to update and self-report the information when they next log in and access their profile via the RCN website. The RCN options for ethnicity data are: Any other group, Arab, Asian-Any other background, Asian-Bangladeshi, Asian-Indian, Asian-Pakistani, Black-African, Black-Caribbean, Black-Other, Black British, Chinese, Mixed-Any other background, Mixed-White & Asian, Mixed-White & Black African, Mixed-White & Black Caribbean, Not given, White, White-British, White-Irish, White-Any other background, Withheld by member. Ethnicity is a non-mandatory data field and members, and customer may choose not to provide the data.

In addition to ethnicity data collected when members or customers engage with RCN for membership purposes, RCN members may also take part in research opportunities including surveys. Ethnicity data is captured as a non-mandatory data survey question with the options provided above and an additional option of Asian-Filipino included since the beginning of 2022.

The raw data is analysed and descriptively reported using the individual options identified provide above, where the sample size is large enough. For external reporting, the raw data is analysed by harmonised categories: Asian, black, mixed, white British, white other, prefer not to say and other. The sample size of the harmonised groups are included in external reports.

The RCN analyses external data sources to understand the impact on the nursing community. These data sources include NMC, NHS digital and UCAS data sources.

Proposal 1: We will publish the draft standards as they are presented here.

- 5. Do you agree or disagree that we should publish this version of the Standards for Ethnicity Data? Please choose one option below.**
- a. Agree, this version should be published**
 - b. Disagree, this version needs to be changed**
 - c. Don't know**

RCN ANSWER:

Disagree

- 6. (If selected disagree) What do you think should be changed in this version of the Standards for Ethnicity Data? These might be additions, deletions or amendments to the current text. Please give details below**

RCN ANSWER:

The RCN is very concerned to see that the standards suggest that there may be circumstances where it would be permissible to allow for third party or proxy reporting of a person's ethnicity. The standards state that this includes "using visual appearance" and "using an algorithm based on name and location".

The RCN believes this provision should be removed from the standards and not encouraged or permitted by any government department or public body. Third party reporting of ethnicity is highly subjective and open to bias and other potentially racist stereotypes. As such not only is there a high risk of this practice being offensive and harmful to the individuals whose data is being recorded, it is also a high risk of being inaccurate. Considering the implications and importance of the data being collected, government bodies and departments should prioritise accuracy in their data above all else.

The RCN believes that ethnicity should not be recorded at all if it is not self-reported. The only exception we would propose to this rule would be permitting parents, or those with parental responsibility, to enter data on behalf of children (where the child could not reasonably be expected to provide the information themselves) as per existing rules and regulations regarding recording data on minors. The RCN would not support any other person recording the ethnicity of a child on the child's behalf.

Additionally, the RCN is concerned that the standards state that public bodies and government departments "should use the GSS harmonised categories when analysing ethnicity data". While the standards note the limitations of combining ethnic groups in this way, and while there may be some instances where harmonisation is necessary, the RCN is concerned that government departments and public bodies may be being encouraged to harmonise unnecessarily. Government departments and other public bodies should be held to the highest standard in data collection and analysis so should not be encouraged to use blunt tools like harmonisation inappropriately. We would expect the standards to be clearer on when harmonisation is and isn't suitable.

The RCN is concerned that harmonisation can hide some of the important issues being measured especially when sample sizes are small. There are certain patterns and trends that broad ethnicity data can show that are lost when the data is harmonised. Some issues or practices may be more linked to culture than ethnicity, so a more

comprehensive breakdown and analysis is needed. This is particularly true for more marginalised communities when talking about health inequalities. For example, the health inequalities experienced by the Chinese community are often very different than those in the Indian community and any harmonisation of both groups into 'Asian' would overlook very important nuances between the two communities.

Additionally, harmonisation of data restricts the ability of that data to be used in comparisons over a longer period of time. When using government data in order to measure trends in growth, decline, or any other patterns, we need to be able to use more specific data sets. If data published by the government or other public bodies is harmonised too much it becomes more of a snapshot in time rather than a tool for accountability and measurement of progress.

The RCN also notes that the standards have not referenced predicted trends and patterns of ethnicity including the future of mixed parentage. As we see more and more people indicating that they are 'mixed race' the standards do not currently consider potential issues with this measurement either now or in the future. The RCN would not want 'mixed race' to become too broad of an ethnicity category resulting in potential issues that people within this group experience being missed. For example, there will be certain health issues or inequalities faced by someone who identifies as mixed race where that includes white British and African parentage that would be less likely if someone who also identifies as mixed race but with white British and Indian parentage.

The RCN would also expect that the standards contain more explicit references on how to interpret ethnicity data and in particular, the need to consider intersectionality. This will be particularly important if the intention is to produce similar standards for data on other groups of people. Broad cultural understanding must be used in the analysis of equality data in order to accurately analyse what the data may or may not show. Patterns that may seem attributable to ethnicity may actually be more reflective of other socio-economic characteristics as well as other protected characteristics as found in the Equality Act 2010. There must be a level of cultural awareness when reviewing ethnicity data in order to ensure bias is limited in any interpretation.

The RCN is also concerned to see minimal references made to the need for government and public body data to be congruent with data recorded from the Census. Considering how frequently public data is compared to and matched with Census data, we would expect organisation to be encouraged in the standards to be consistent with the Census methodology so they can be matched and compared both now and in the future. While the standards do currently highlight 'National identity, ethnic group, language and religion question development for Census 2021' as supporting evidence, there is no reference to the importance of using the Census as a reference point or guide for framing their questions on ethnicity.

Proposal 2: The Equality Hub will monitor the use and impact of the standards, along with the Office for Statistics Regulation (OSR). OSR can assess how data producers and users of ethnicity data are following the standards. OSR can also provide guidance on areas where collection, analysis and reporting of ethnicity data might be improved.

7. Do you agree or disagree with our proposal for monitoring the use and impact of the Standards for Ethnicity Data? Please choose one option below.
 - a. Agree

- b. Disagree
- c. Don't know

RCN ANSWER:
Agree

8. (If selected disagree) How do you think we could monitor the use and impact of the Standards for Ethnicity Data?

RCN ANSWER:
No comments on this as not permitted on form

Proposal 3: We will develop similar standards for data on other groups of people (for example data about disabled people).

- 9. Do you agree or disagree with us producing standards for data on other groups of people? Please choose one option below.**
- a. Agree
 - b. Disagree
 - c. Don't know

RCN ANSWER:
Agree

10. (If selected disagree) Please outline your reasons for disagreeing that we should produce standards for data on other groups of people.

RCN ANSWER:
No comments on this as not permitted on form

Other comments

11. Is there anything else you would like to tell us about the Standards for Ethnicity Data? Please give details below

RCN ANSWER:
As these standards are considered to be best practice rather than compulsory, the RCN is concerned that there is therefore little accountability towards any department or public body that fails to adhere to these standards. The data collected and shared by government agents is of significant value and importance. Its accuracy and fairness often set the standards for other sectors and industries. Robust ethnicity data standards should therefore be compulsory rather than optional.

The RCN is also aware that these standards must be practically applicable to those who currently collect and analyse government data and is concerned that there is no mention of the need to train people in how to follow them. RCN members will often record and store large amounts of personal data on their patients and other members of the public.

They will need to be supported to learn how to record data correctly and the importance of following set standards.

It is also not clear within the standards themselves whether they are applicable only to data on the public or external parties or whether it also applies to the government's own workforce and internal practices. We would expect that comprehensive standards on how to accurately record ethnicity would also be used for governments and public bodies, like the NHS, to record data on their own workforce and employees. Ensuring accurate ethnicity data on internal processes and procedures is essential for government transparency and accountability.