



Beyond 2011: The Census in England and Wales

ONS Consultation on User Requirements

**Response submitted by the Equality Commission for
Northern Ireland**

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Executive Summary

1. The Equality Commission for Northern Ireland recognises that the ONS “Beyond 2011 programme” is centred on assessing alternative options for producing the population and socio-demographic data required in England and Wales. We wish to respond however as changes in England and Wales will likely have considerable implications for Northern Ireland.
2. In Northern Ireland, high quality local level data, disaggregated by equality characteristics, are central to the effective implementation of key pieces of equality and human rights legislation such as the Fair Employment and Treatment Order; Section 75 of the Northern Ireland Act; the duties under the Disability Discrimination Order and the United Nations Convention on the Rights of people with Disabilities.
3. Lack of availability of high quality local level data across equality areas would pose a significant obstacle to those implementing and monitoring progress relevant to statutory equality requirements.
4. Timely, accurate and reliable data for local areas and population subgroups and the ability to disaggregate data on equality grounds are of importance to the Commission.
5. We consider that at present Census data is best placed to deliver high quality local area data as sample surveys do not currently provide a robust alternative to Census statistics in Northern Ireland. This is generally because small sample sizes often do not allow figures to be meaningfully disaggregated to consider equality characteristics much below the Northern Ireland level.
6. We consider that an increased frequency of data collection would be helpful, and note the occurrence of a 5 yearly Census in the Republic of Ireland.

7. Administrative data in Northern Ireland would need to robustly record characteristics across a range of statutory equality (Section 75) grounds and be comprehensively cross-linked to provide any suitable alternative to the Census.

8. There are likely to be considerable cost implications of enhancing UK wide sample surveys so as to provide robust small area estimates in Northern Ireland; and in comprehensively linking administrative records to form robust estimates of the population at the local area level.

Introduction

1. The Equality Commission for Northern Ireland (“the Commission”) is an independent public body established under the Northern Ireland Act 1998.
2. The Commission is responsible for implementing the legislation on fair employment, sex discrimination and equal pay, race relations, disability and age. The Commission’s remit also includes overseeing the statutory duties on public authorities to promote equality of opportunity and good relations under Section 75 of the Northern Ireland Act 1998 (Section 75) and the disability duties under the Disability Discrimination Act 1995.
3. The Commission, along with the Northern Ireland Human Rights Commission, has been designated under the United Nations Convention (UNCRC) as the independent mechanism tasked with promoting, protecting and monitoring implementation of the UNCRC in Northern Ireland.
4. The Commission welcomes the opportunity to respond to the Office of National Statistics’ (ONS) “Beyond 2011: Consultation on user requirements” for the Census in England in Wales, as we acknowledge that any changes to the Census methodology in England and Wales will likely have profound implications for the UK as a whole.

Responses to Key Questions posed by the ONS Consultation

What information requirements¹ have declined in importance to you/ your organisation over the last five years?

5. The information requirements of the Commission, and those subject to the equality duties, covers the full range of socio-economic issues (e.g. Education, Health, Housing, Employment etc) for a range of equality grounds i.e.:
- age,
 - gender,
 - those with a disability and those without,
 - racial group,
 - sexual orientation,
 - marital status,
 - those with, and those without, dependants
 - religious belief,
 - political opinion.
6. No information requirements have declined in importance to the Commission over the last five years. Where Census data across a range of areas (e.g. household and family structure, housing, labour market and socio-economic characteristics, health and migration etc) can be disaggregated by equality-related population characteristics (e.g. age, sex, marital/civil partnership status, dependents, ethnicity, identity, religion, disability and long-term illness etc) it can be used to inform a range of equality relevant work in Northern Ireland and in facilitating employers and service providers to fulfil their statutory obligations.

¹ in relation to population, household and family structure, housing, labour market and socioeconomic data, ethnicity, identity, religion and language, health, migration and other

What information requirements² have emerged/increased in importance to you/ your organisation over the last five years?

7. As noted in the ONS Consultation document, the changing nature of population dynamics can increase information needs. Information on race and ethnicity has become increasingly important in Northern Ireland in recent years, associated with changing population dynamics. The Commission also continues to seek the inclusion in the Census and other public surveys of information on areas such as sexual orientation. The recent ratification of the UN Convention on the Rights of people with Disabilities also requires Government to collate and utilise data to track and ensure fulfilment of its obligations under the Convention. High quality local level data is thus central to Government, Employers and Service providers. We set out the following by way of illustrative examples:

8. Under **Section 75 of the Northern Ireland Act** , public authorities have a statutory obligation in carrying out their functions relating to Northern Ireland to have due regard to the need to promote equality of opportunity:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependents and persons without;

In addition, without prejudice to this obligation, Public Authorities are also required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion, and racial group.

² Ibid

9. The first review of the effectiveness of the Section 75 statutory duties was published in 2007³. Since 2010 and following the recommendations of this review, public authorities, in delivering their duties, use Census and other data in all areas, disaggregated by the above Section 75 equality grounds, to undertake an ‘**audit of inequalities**’ aligned to their functions and remit. This audit of inequalities assists the public authority in identifying key areas and inequalities within their remit on which they may exert an influence. Public authorities also require robust, sometimes local data to undertake screening and equality impact assessments as part of their policy development processes. Robust local area data from the Census is thus not only required by public authorities and the Commission to identify inequalities, but to monitor the subsequent impact of any policies.
10. **Disability duties:** Data on disability / long-term illness, health and the nature of disability has always been of crucial importance to the remit of the Commission in monitoring the implementation of equality and anti-discrimination legislation including the Disability Discrimination Act (DDA) 1995 and the statutory duties on public authorities including Section 75. However, in 2006 the Commission was also given responsibility for monitoring the implementation of the disability duties on public authorities under Section 49 of the DDA 1995⁴. Robust local area data is required to identify inequalities for disabled people and track the impact of any associated policies and/or programmes to address these issues.
11. **UNCRPD:** In 2009, the Commission was jointly designated along with the Northern Ireland Human Rights Commission (NIHRC) as the Independent Mechanism for Northern Ireland (IMNI) for monitoring the implementation of the United Nations Convention on the Rights of People with Disabilities (UNCRPD). Article 31 of the UNCRPD⁵ requires

³ ECNI (2007). Section 75: Keeping it Effective. Reviewing the Effectiveness of Section 75 of the Northern Ireland Act 1998. ECNI: Belfast.

⁴ As amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006.

⁵ <http://www.un.org/disabilities/documents/convention/convoptprot-e.pdf>

that data should be considered to assess the implementation of the Convention and to identify and address barriers for disabled people. The ability to produce high quality local level data disaggregated by disability, nature of disability and other equality grounds is likely to increase in importance to the Commission and to Government as it likely to be essential in monitoring the implementation of the disability duties and fulfilling international requirements under Article 31 of the UNCRPD.

12. The **Fair Employment and Treatment (Northern Ireland) Order 1998** (hereafter 'FETO') requires registered and specified employers, amongst other duties, to: monitor the composition of their workforce and of those applying, appointed, leaving or being promoted; and review their workforce composition and employment practices at least once every three years, "for the purposes of determining whether members of each community are enjoying... fair participation" and the "affirmative action (if any) which would be reasonable and appropriate". To assist in this consideration, employers require data on labour supply, by gender and community background, for their local labour supply area. The Census of Population is the only source currently able to supply appropriate data at the local level.

13. **Migration:** Migration and the ethnic composition of the population is an area of ongoing interest for the Commission and we look forward to considering data from the Census 2011 on this issue. Northern Ireland has historically been associated with out-migration and low levels of immigration. However, since 2004, Northern Ireland has experienced a rapid increase of migrant workers from the A8 EU Accession countries⁶. This period was associated with the enlargement of the EU, a period of economic growth and a more peaceful climate in Northern Ireland. This rise in immigration mid-Census period out-dated previous estimates and projections and meant that demand outstripped service provision and

⁶ Bell K, Jarman N & Lefebvre, (2004). *Migrant Workers in Northern Ireland*. Institute for Conflict Research (ICR): Belfast.

policy planning during the initial influx⁷. Due to lack of data it was initially challenging to assess the impact of immigration and inequalities amongst migrant workers⁸.

14. Whilst a number of administrative sources are currently used to estimate the inflow of migrant workers, assessing outflows and therefore, an overall population estimate has proved challenging and is subject to error at low geographical levels⁹. The current economic climate may impact on migration in-flows and out-flows as local and EU workers try to find employment in a recession. The availability of robust data at low geographical levels is, therefore, central to assessing inequalities for migrant workers and influencing policy provision in Northern Ireland.
15. **Sexual Orientation:** In 2011 a question on Sexual Orientation was excluded from the Census. In 2007, the Commission responded to NISRA's questionnaire on "Census 2011: User priorities for Topics and Questions". The Commission highlighted the acute lack of information on sexual orientation and that the Census office recognised that there is a considerable need for this data, particularly for equality monitoring purposes.
16. Lack of accurate, local level quantitative data on sexual orientation impacts on the ability to establish an evidence base on the incidence and inequalities impacting on the small population subgroup that identifies as "other than heterosexual". At present sample surveys cannot be used to provide robust statistics for such small population subgroups. While the Commission acknowledged that there may be an undercount due to those who may not wish to declare their sexuality, the Commission remains of the view that this question is vital to equality

⁷ See Martynowicz A and Jarman N. (2009) *New Migration, Equality and Integration: Issues and Challenges for Northern Ireland*. ECNI: Belfast.

⁸ Ibid

⁹ NISRA (2008). *Size of the EU Accession (A8) population resident in Northern Ireland*. NISRA: Belfast

monitoring under anti-discrimination legislation and Section 75 and for future planning of services.

17. **Income:** In 2007, the Commission responded to NISRA's questionnaire on "Census 2011: User priorities for Topics and Questions". The Commission was of the view that data on income would allow for the identification of economic disparities on grounds such as gender, religion, age and ethnicity etc. The Commission acknowledges the concerns in regards to the public's willingness to answer this question, however, the Commission is still of the view that data on income would be of tremendous value to our understanding of equality issues, particularly in view of the current economic downturn.

How would you/your organisation be affected if the data was not available to support your information requirements under the following themes¹⁰?

18. Lack of availability of high quality equality relevant data in all areas would pose a significant challenges to the development, implementation and monitoring of equality legislation, policies and programmes. These challenges include the provision of robust demographics on equality grounds; the provision of robust data on small population equality subgroups and at local geographical levels; disaggregation of data on equality grounds and benchmarking for sample surveys.
19. In general terms, Census data disaggregated by equality grounds plays a pivotal role in policy-making and is essential for monitoring policy implementation and outcomes. Policy without valid and reliable data is potentially costly and wasteful. The lack of availability of this data would therefore impact on the ability to obtain data on equality grounds as at present the Census is the most comprehensive means of capturing equality-related statistics.
20. Information from the Census has been used by the Commission to provide an evidence-base to identify and describe key inequalities in Northern Ireland; to influence policy making in Northern Ireland, and in the evaluation of legislation and policy in Northern Ireland. Lack of availability of this information would impact on the Commission's ability to provide this evidence base.
21. Over the years, the Commission (and its predecessor bodies) have used the Census in all areas as a data source for key analyses (for example – ECNI (2006) Census 2001: Limiting long-term illness in Northern Ireland) or as part of the evidence base to inform flagship publications (e.g. ECNI (2007) Key Inequalities in Northern Ireland¹¹)

¹⁰ population, household and family structure, housing, labour market and socioeconomic data, ethnicity, identity, religion and language, health, migration and other

¹¹ <http://www.equalityni.org/archive/pdf/Keyinequalities%28F%291107.pdf>

22. The Commission has also supported academic work, using the Census, to consider a range of key issues over time – for example, with regards to fair employment:

- Osborne, R.D.; Shuttleworth, I.G.; (eds) (2004) “Fair Employment in Northern Ireland: A Generation On”, Equality Commission / Blackstaff Press.
- Cormack, R.J.; Gallagher, A.M.; Osborne, R.D. (1993); “Fair Enough? Religion and the 1991 Population Census”; Fair Employment Commission
- Gallagher, A.M.; Osborne, R.D. Cormack, R.J.; (1994); “Fair Shares? Employment, Unemployment and Economic Activity”; Fair Employment Commission

The Commission also draws on the work of others, for example:

- Shuttleworth, I.; Lloyd, C.; (2006) Are Northern Ireland’s Two Communities Dividing?: Evidence from the Census of Population 1971-2001, Shared Space, Northern Ireland Community Relations Council.

23. Census information in all areas has allowed the Commission to establish precise quantitative data for population subgroups and local areas. Lack of availability of this information would, therefore, impact on the ability of the Commission to establish data for small population equality subgroups (for example, Irish Traveller, BME) and at local (community) levels for which sample surveys cannot supply robust statistics¹².

24. Robust local area statistics, disaggregated by equality grounds, is also central in allowing employers and public authorities to fulfil their statutory obligations. Lack of availability of population information at the local level would therefore impact on the ability of employers and public

¹² See NISRA (2010). The 2011 Census of Population in Northern Ireland: Proposals. DFP: Belfast. Section 1.13 and 1.17

authorities to fulfil their statutory obligations, monitor policies, and plan future service provision.

25. For example, **Article 55 of the Fair Employment and Treatment (Northern Ireland) Order 1988**¹³ requires employers to monitor the composition of their workforce and of those applying, appointed, leaving or being promoted (Article 52) and review their workforce composition at least once every three years (Article 55), “for the purposes of determining whether members of the Protestant and Roman Catholic communities are enjoying....fair participation” in their employment. This consideration involves the employer comparing the composition of their workforce to the composition of the local labour supply. Robust, local level data is central to this comparison and the Commission considers that currently only the Census in Northern Ireland is able to provide the appropriate level of data.
26. Census data has also played a crucial methodological role in equality-related Commission research. Census data has been used to benchmark and improve the quality of information from other data sources used by the Commission such as sample surveys. For example, census-based population estimates have been used to benchmark population quotas in surveys and weight data post-survey to ensure a representative sample of key equality groupings in Northern Ireland. A key defining characteristic in the decision to use the Census of Population is not only the precision that a census provides but that sample surveys are often insufficient at providing robust statistics at the local (community) level. In the context of population estimates in Northern Ireland this would mean that surveys would need to be larger

¹³ The Fair Employment and Treatment (Northern Ireland) Order 1998 makes it unlawful to discriminate on the grounds of religious belief and/or political opinion in the fields of employment, the provision of goods, facilities and services, the sale or management of land or property and further and higher education. In addition to providing protection from discrimination, the legislation seeks to promote 'equality of opportunity' (for those in, or seeking to be in employment or any occupation) and provides for 'affirmative action' to secure 'fair participation' in employment for members of the Protestant or Roman Catholic communities. <http://www.legislation.gov.uk/nisi/1998/3162/article/55/made>

and would require costly booster samples to ensure appropriate coverage and reliability.

27. **The Commission considers that the Census of Population is the only available data source in Northern Ireland which provides data at the local area level.** Lack of availability of this data disaggregated on equality grounds would therefore potentially impact on the provision of this information at local area level and therefore, on the effective implementation of this legislation.

28. Lack of availability of Census data in general may also create challenges in the provision of statistics for persons living in communal establishments (CE), including those living in hospitals, residential and social care institutions etc, that may receive limited coverage in sample surveys. In 2009, the ONS stated that “the decennial Population Census is likely to remain the most reliable integrated source of CE data”¹⁴.

What new work, policies or emerging priorities are likely to affect your information requirements over the next five years?

29. Implementation of strategies and policies arising from the Northern Ireland Executive Programme for Government and Westminster will impact on our information requirements over the next five years.

30. Implementation of key strategies and policies in the Programme for Government and ongoing work on the Review of Public Administration will result in the development of new Equality Schemes, Equality and Disability Action Plans, Equality Impact Assessments (EQIA) and audits of inequalities under Section 75 of the Northern Ireland Act and the disability duties. These may highlight gaps in information requirements on equality grounds that will need to be addressed. Implementation

¹⁴ ONS (2009). Labour Force Survey User Guide – Volume 1: background and Methodology.

and monitoring of the UN Convention on the Rights of People with Disabilities (UINCRPD) is another example which will also require robust data across a range of areas.

31. The Northern Ireland Executive has committed itself to accountability and effective monitoring of its Programme for Government and the Commission will need to ensure information requirements for monitoring our effective for our purposes.

Are there any alternative data sources, other than ONS outputs, which you think we should investigate for population and socio-demographic statistics? These could be national, regional or local statistics.

32. The Commission offers a limited response to this question, in seeking to confine our response within our core area of expertise.

33. The Commission considers that the Census provides the most reliable source of population and equality-related characteristics in the UK and is used to improve and quality-assure information collected from other data sources such as sample surveys. In Northern Ireland, sample surveys, for example the Labour Force Survey (LFS), are comparatively less reliable, in that they provide estimates of population characteristics rather than exact measures¹⁵.

34. **Surveys** conducted using samples of the population, for example, the LFS, do not currently provide a robust alternative to Census based small area statistics in Northern Ireland, as small sample size and associated sample error does not allow these estimated figures to be disaggregated to consider equality characteristics at the local area level. In the context of robust population estimates in Northern Ireland this

¹⁵ Department of Enterprise, Trade and Investment. (2006). Northern Ireland Labour Force Survey: Performance and Quality Monitoring Report. DETINI: Belfast.

would mean that surveys would need to be larger and would require costly booster samples to ensure appropriate coverage and reliability.

35. The issue of **sample size** may have wider compliance implications, for example, Article 31 of the United Nations Convention requires that data on disability should be disaggregated to assess the implementation of the Convention and to identify and address barriers¹⁶. In addition the Regulation of the European Parliament and the Council on Population and Housing Censuses requires Member States to provide data at the level of Local Area Unit 2 (LAU2) equivalent to electoral ward level in Northern Ireland¹⁷. Currently this information can only be fully captured at this geographical level by the Census¹⁸.
36. The small size of the total population in Northern Ireland adds a further layer of complexity. The LFS User Guide notes that *“it is the nature of sampling variability that the smaller the group whose size is being estimated, or from which an estimate is being derived, the less precise that estimate is”*¹⁹. Estimates from surveys will thus be more unreliable for small population subgroups (e.g. ethnic minorities) or small geographical areas as they may be subject to a high degree of sampling variability.
37. Concern with the quality and reliability of survey statistics in the absence of the Census has been raised by the Northern Ireland Statistics and Research Agency (NISRA). NISRA has stated that sample surveys cannot provide robust statistics for small population subgroups, such as ethnic minority populations²⁰ and at small geographical levels such as electoral ward²¹. In presenting the business

¹⁶ <http://www.un.org/disabilities/documents/convention/convoptprot-e.pdf>

¹⁷ See NISRA (2010). The 2011 Census of Population in Northern Ireland: Proposals. DFP: Belfast. Section 1.17

¹⁸ Ibid

¹⁹ ONS (2009). Labour Force Survey User Guide – Volume 1: Background and Methodology. ONS: UK

²⁰ NISRA (2004). The future provision of demographic statistics in Northern Ireland (towards the 2011 Census). Information paper. NISRA: Belfast.

²¹ See NISRA (2010). The 2011 Census of Population in Northern Ireland: Proposals. DFP: Belfast. Section 1.17

case for the 2011 Census, NISRA was of the view that ***“the Census was still the most authoritative source of information for a wide range of uses. It provides a snapshot of the country, with consistent and comparable information for small areas and subpopulations, and allows multivariate analyses that are not feasible using any other data source”***²².

38. **Administrative records**, another source of population and socio-demographic statistics in Northern Ireland do not always collect information on all equality grounds covered by Section 75. Where data is collected this may be confined to a limited number of grounds (e.g. age and gender) or data may be incomplete. This is because administrative records are, by design, focussed on their administrative purpose and thus may not meet wider user needs or may only provide a proxy for the underlying population²³.
39. To present an alternative to the Census, administrative records would need to be comprehensively linked and cross-tabulated²⁴ and capable of tracking change on a longitudinal basis. This may require a comprehensive population register and system of linkage such as that used in Denmark, Finland, Norway and Sweden²⁵, and such data linkages may require legislative change²⁶. Research in Northern Ireland has, however, indicated that many such records are subject to gaps in the range and quality of data²⁷. It is also likely that none of these would at present be able to provide the full range of equality demographics required by the Commission and provided for by the Census.

²² NISRA (2010). The 2011 Census of Population in Northern Ireland: Proposals. DFP: Belfast. Section 1.13

²³ NISRA (2004). The future provision of demographic statistics in Northern Ireland (towards the 2011 Census). Information paper. NISRA: Belfast.

²⁴ Ibid

²⁵ See Ralphs M and Tutton P (2011) Beyond 2011: International models for census taking: current processes and development. Office for National statistics (ONS): UK.

²⁶ NISRA (2010). The 2011 Census of Population in Northern Ireland: Proposals. DFP: Belfast.

²⁷ Ijpelaar J, Marshall D, Paul S and Moylan K (2011) Quality Report / User Guide – Northern Ireland Population Estimates. NISRA Occasional Paper No. 32: NISRA

40. NISRA has indicated that the Census provides the basis for equality monitoring by government, in particular *“census information on age, sex, ethnicity, religion and disability help to identify the extent and nature of disadvantage and to measure the success of equal opportunities policies”*²⁸.
41. The Commission is of the view that should an alternative to the Census involve administrative records, this must include the recording of equality demographic on Section 75 grounds. This level of information is not only useful to the work of the Commission but would be useful to public authorities in fulfilling their statutory duties under Section 75 of the Northern Ireland Act 1998.
42. The Commission is also aware that administrative data is not always completely accessible due to issues of privacy and confidentiality. If administrative records were used to gather Census data the issue of data access for research whilst maintaining the confidentiality of individual records would need to be addressed.
43. Other challenges in relation to the use of **administrative and/or survey data** include the consistency and stability of concepts used in survey and administrative data. The quality and robustness of equality data for the population is contingent on the consistency of concepts used between surveys. For example, research²⁹ has identified that the concept of disability used in a survey can impact on population estimates of disability. The challenge would be to ensure stability of concepts between surveys and administrative records used for the purpose of gathering Census information and longitudinally across time.
44. In addition, inconsistencies between regional administrative records and surveys due to differences in the regional context have the potential to impact on the harmonisation of UK statistics and will need to be

²⁸ NISRA (2010). The 2011 Census of Population in Northern Ireland: Proposals. DFP: Belfast. Section 1.8

²⁹ MSA-Ferndale (2004). Review of disability information project for DFP NISRA. DFP: Belfast

addressed. For example, the Northern Ireland version of the Family Resources Survey (FRS) and Labour Force Survey (LFS) use a different sample design and/or sampling frame than in Great Britain³⁰.

45. The harmonisation of the Census across UK regions has allowed the Commission to establish cross-comparisons between equality groupings in Northern Ireland and other parts of the UK. It has also provided a reliable means of tracking change across social and economic indicators across time.
46. There is a danger that an alternative to the Census may result in de-harmonisation of statistics between the UK regions and greater challenges in making robust inter-regional and/ or whole UK comparisons. It is, therefore, crucial that continued close cooperation and joint working is carried out on Census policy between England and Wales and other UK regions to ensure harmonisation of any alternative arrangements.
47. Any decision to move away from a Census of Population must also recognise that there are likely to be considerable cost implications of enhancing UK wide sample surveys (i.e. by increasing sample sizes) so as to provide robust small area estimates in Northern Ireland; and in comprehensively linking administrative records to form robust estimates of the population at the local area level.

<i>Trade Offs: Accuracy versus frequency versus geography</i>
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48. In apportioning points across the various themes in the consultation³¹, the Commission is of the view that high frequency, local geography and highly accurate statistics are all key aspects.
49. We consider that an increased frequency of data collection would be helpful, and note the occurrence of a 5 yearly Census in the Republic of

³⁰ Rafferty A (2010). Introduction to Complex Sample Design in UK Government Surveys. ESDS:UK

³¹ population, household and family structure, housing, labour market and socioeconomic data, ethnicity, identity, religion and language, health, migration and other

Ireland. We have highlighted the problems with sample surveys in Northern Ireland having insufficient sample sizes to allow disaggregation of equality groups much below the Northern Ireland level. Although local data is important, equality data at Ward or Super Output Area may represent a reasonable compromise. Accuracy is important, particularly for smaller populations.

50. In response to your specific question, We suggest a weighting as follows:

- High frequency - 20
- Small area geography – 35 (breakdowns to Ward, SOA and LGD)
- High accuracy – 45

51. Accurate and reliable data for local areas and population subgroups and the ability to disaggregate data on equality grounds are our main requirements.

Concluding Comments

52. The Commission acknowledges the need to balance frequency, accuracy, small area geography and cost. However, the small population of Northern Ireland presents unique challenges to collecting data on equality in Northern Ireland including accuracy and reliability of sample survey data at local areas of geography and for small population subgroups and ability to disaggregate data on equality grounds.

53. Frequency of data, is also important to the Commission, particularly in light of the rapidly changing demographics on Northern Ireland.

54. In light of the particular challenges for data collection in Northern Ireland the Commission is of the view that should the UK government decide to discontinue the decennial Census the Northern Ireland Executive should ensure the provision of accurate and reliable data for local areas / population subgroups and the ability to disaggregate data

on equality grounds are our main requirements. This may included giving serious consideration to the introduction of a Northern Ireland Census. The Commission recognises that the issue of scale and cost of a Northern Ireland Census would be an important consideration, however, the Republic of Ireland which has little more than double the population of Northern Ireland has a quinquennial census.