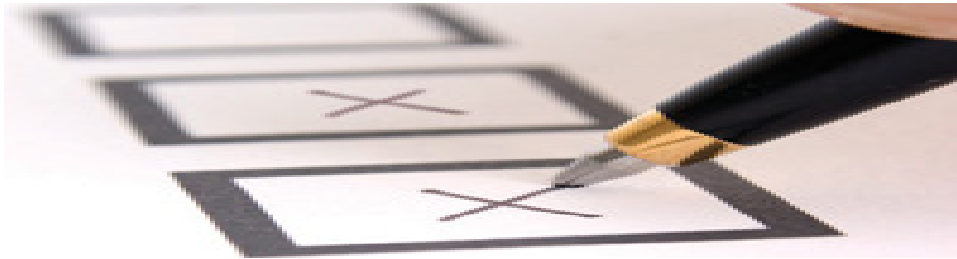


CAN THE OFFICE FOR NATIONAL STATISTICS BE TRUSTED WITH THE 2011 CENSUS?

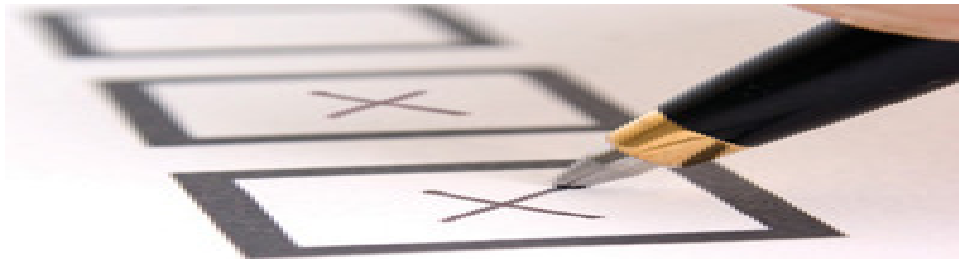


An investigation into the ONS process to select ethnic groups for the 2011 Census questionnaire and the unfair exclusion of the 'Sikh' category



Report commissioned by the Sikh Federation (UK)
January 2010

CAN THE OFFICE FOR NATIONAL STATISTICS BE TRUSTED WITH THE 2011 CENSUS?



An investigation into the ONS process to select ethnic groups for the 2011 Census questionnaire and the unfair exclusion of the 'Sikh' category

The Sikh Federation (UK) is a non-governmental organisation that was established in September 2003, with the aim of giving Sikhs a stronger political voice by taking an increasing interest in mainstream politics in the UK.

It is a pressure group that is often referred to as the first ever Sikh political party in the UK. The aims and objectives are to work closely with each of the main political parties. The Federation is based on the "miri-piri" principle, the Sikh principle that temporal and spiritual goals are indivisible.

It also provides the Sikhs with a much needed voice at an international level and is in the process of seeking consultative status with the United Nations at the earliest opportunity.

The Federation currently has branches and members in towns and cities throughout the UK. Over 180 member organisations are affiliated to the Sikh Federation (UK) including Gurdwaras, local youth and women's groups, groups for the elderly and other local Sikh organisations. The recently established Sikh Lobby Network has over 1,600 members and the capacity to directly lobby over 300 MPs.

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1. Executive Summary

"What gets counted gets done."

A recent report¹ into police practices concluded with the aforementioned statement, yet the same quote can also be applied to every area of our lives. The statement above captures how children's learning needs are catered for, the extent to which health services are commissioned and how discrimination is acted upon.

It is easy to think of terms such as monitoring or measuring as abstract concepts that only serve the interest of statisticians or civil servants. Indeed, if that were the only purpose of such terms, Sikhs would not have co-ordinated a sustained campaign for separate monitoring for a period of nearly a decade. In the interest of fairness and equality, Sikhs have throughout the last decade engaged with the relevant processes to tackle a systemic failing which results in them being deemed invisible.

The Census information is used as a baseline for policy makers and service planners to forecast and respond to service needs. The Census is *everyone's* opportunity to be counted. What this means in practice is that long before a nurse is treating a patient; the hospital, local authority and government department have considered the specific needs of all in the community, by use of accurate data of the population they serve.

What happens if you are not counted? How can anything 'get done'? If you are not counted in a system that adopts widespread monitoring as a built-in function to service delivery, quite simply, your needs are dealt with at best on an inefficient ad hoc basis or, as is most likely, you remain hidden.

The Office for National Statistics (ONS) state that data on ethnic groups help to identify the extent and nature of disadvantage in Britain, and to measure the success of equal opportunities policies. The information helps central and local government to allocate resources and plan programmes to take account of the needs of minority groups.²

Throughout the period of a decade, Sikhs have campaigned tirelessly knowing that the impact on their own lives and that of their families would be both wide reaching and real. There is a need for better understanding of the inequalities

¹ Reducing Bureaucracy in Policing (2009) <http://police.homeoffice.gov.uk/publications/police-reform/reducing-bureaucracy-policing.html>

²ONS Why have a census? <http://www.ons.gov.uk/census/what-is-a-census/why-have-census/index.html>

that are presented within the education, health, justice and other systems. For example, approximately 1 in 3 Sikh children recently reported feeling unfairly discriminated against³. Issues such as this will only be tackled if Sikhs are counted.

Upon designing the 2011 Census questionnaire, the ONS recognised the need to amend the ethnic group question. However, they also stated that only two new ethnic groups could be introduced due to logistical and financial reasons. Therefore, a Prioritisation Tool was formed to evaluate evidence for a number of proposed ethnic groups. The Prioritisation Tool was the key process which resulted in the introduction of two new categories for the draft 2011 Census questionnaire. The 'Gypsy or Irish Traveller' category was ranked in first position on the tool and the 'Arab' category was ranked in second position.

This report finds that three of the four themes used as a basis for scoring each proposed ethnic group within the Prioritisation Tool severely marks down the 'Sikh' category on an incorrect and unfair basis. Sikhs; a legally defined ethnic group were ranked 8th out of 12 rankings. This rank was shared with the 'Cornish' category and the 'White and Chinese' category. The three themes of the Prioritisation Tool for which the 'Sikh' category were penalised were:

1. Strength of need
2. Lack of alternative sources
3. Clarity, quality and acceptability

The following shortcomings applied to three of the four themes when scoring the 'Sikh' category:

- Omission of vital information, thus creating skewed scores
- Use of inconsistent or contradictory rationale between proposed ethnic groups
- Not fully considering the evidence to form accurate conclusions

³ Memorandum submitted by the Equality and Diversity Forum:
http://www.publications.parliament.uk/cgi-bin/newhtml_hl?DB=semukparl&STEMMER=en&WORDS=sikh&ALL=sikh&ANY=&PHRASE=&CATEGORIES=&SIMPLE=&SPEAKER=&COLOUR=red&STYLE=s&ANCHOR=muscat_highlighter_first_match&URL=/pa/jt200809/jtselect/jtrights/157/157we22.htm#muscat_highlighter_first_match

Key findings of the report are illustrated below:

Both the Prioritisation Tool and the Equality Impact Assessment did not adequately consider the impact of excluding a legally defined ethnic group, which has the support of the community, to be monitored separately.

ONS recommended the use of proxy measures in place of a separate 'Sikh' category, in reality the closest proxy measure undercounts the Sikh population by at least half, nor is this proxy a mandatory measure. The religious affiliation question recorded 336,000 Sikhs while the actual figure is estimated to be approximately 600,000. While the ONS state that in Census 2001 91% of Sikhs recorded their ethnicity as Indian, research cited in this report has indicated that when people are forced to select a classification the use of 'Indian' category increases four fold in comparison to how people actually describe themselves.

The validity of the 2001 Census output for the number of Sikhs in England and Wales is highly questionable. The figure of 336,000 was met with both concern and scepticism by the Sikh community and a number of MPs, hence the considerable number of separate monitoring requests and lobbies. For example, this report highlights that upon analysis of the electoral register in a town with a large Sikh population the Census undercounted Sikhs by 44%.

Distinct and significant differences within the current ethnic category of 'Indian' were not considered. Of all religions in the UK, Sikhs are the most likely to have been born in the UK. Hindus are the least likely of all religious groups to have been born in the UK, followed by Muslims and Buddhists. Classifying Sikhs largely into the 'Indian' ethnic group will lead to inaccurate and broad brush assumptions for service delivery plans. Central and devolved government have stated that more detailed information on certain ethnic groups, specifically including Sikhs, is required through refining or introducing new categories in the Census. ONS acknowledge that there was evidence that Sikhs suffer from *racial* discrimination, and that groups who don't have a tick box are disadvantaged by not being monitored as an ethnic group in their own right⁴. Racial discrimination is clearly a legal obligation that authorities must prevent from occurring under the Race Relations (Amendment) Act (RRA) (2000).

ONS continuously advise MPs and their constituents that the option of writing in your ethnic group should be used for Sikhs. Yet by their own admission the 'other ethnic group' is rarely ever analysed and in practice the write-in response can lead to lower visibility of information on such groups.

⁴ Minutes of meeting between ONS and the British Sikh Community organisations Tuesday 24th April 2007 (information obtained from the ONS under the Freedom of Information Act)

Clearly the respondents who complete the Census need to be clear of what is being asked of them and feel that the range of options accurately reflect their ethnicity, which is why the ONS conducted cognitive testing. However, for Sikhs the cognitive testing only took place in Scotland, not England or Wales, the results were then alarmingly generalised for the England and Wales Census. In addition the testing sample was unrepresentative and extremely small thus rendering it grossly and statistically invalid; only seven Scottish Sikhs completed the testing to reflect approximately 600,000 Sikhs in England and Wales. To put this into perspective social science undergraduate dissertations would not accept such generalisations based on the minute sample used. Contrary to this the 2006 Scottish Census Test (tested on a much larger sample) found that of those who selected 'Sikh' for the religious affiliation question; the majority solely selected 'Sikh' as their ethnic group. This fact was not reflected in the ONS Information Paper on the Prioritisation Tool, but was obtained through a Freedom of Information (FoI) request to the ONS. Bearing in mind the significant undercount of Sikhs using the optional religious affiliation question, the inclusion of a 'Sikh' category for the ethnic group question in England and Wales will result in a more accurate picture.

Cognitive testing was also conducted in respect of the 'Arab' category with a sample of 14 Somalis in Wales. The testing was conducted to understand the thoughts and feelings of selecting an ethnic category and whether the selected category was actually an acceptable term in the eyes of the respondent. When the Somali sample in Wales were questioned on how they chose to define their ethnicity all 14 stated Somali. Yet this evidence was used to support the inclusion of an 'Arab' category. In addition generic field-testing, (a rehearsal of the census conducted in certain towns and cities) on a larger sample found at best sporadic use of the category for those the ONS predicted would select 'Arab'. It would appear that results of the testing were made to fit a pre-determined conclusion.

There are distinct and significant factors in respect of Sikhs when examining policy development and service delivery. The Government's Cabinet Office Performance and Innovation Unit has noted that Sikhs are more likely to be unemployed, less well represented in top status jobs and less well paid. No police force is able to monitor and report on the number of Sikhs who have been stopped and searched, arrested or cautioned.

Evidence even demonstrates a difference in standardised mortality rates for some diseases. For example the British Medical Journal noted that Sikh men have a mortality rate which is four times higher than British white men for alcoholic liver disease. These stark findings were not considered in the Prioritisation Tool.

These examples only touch the surface and suggest further deep rooted distinctions are likely to exist.

154 Sikh organisations participated in the ONS written consultation process during 2006/07 and all demanded that their members be monitored, in accordance with the law (RRA), as a distinct ethnic group. In addition to this a number of lobbies, Early Day Motions and Parliamentary Questions have been raised in support of separate Sikh monitoring and demonstrated support from over 200 MPs from across the political spectrum. The Conservative⁵ and Liberal Democrat parties and many Labour MPs have also expressed their support for the need of a separate ethnic category tick box for Sikhs that ONS appear to have ignored. As far as Sikhs are concerned the Prioritisation Tool developed by ONS seems to have ignored its own official consultation and the views of hundreds of elected representatives. The very democratic process which enables constituents and MPs to have constructive dialogue with the State has not been utilised within the tool.

A FoI request submitted in order to create this report found that the General Registers Office Scotland (GROS) refused to attribute scores to the ethnic groups within the Prioritisation Tool as they thought it would not sufficiently aid Ministers and stakeholders in understanding the actual decision making process. More specifically, GROS noted that this would leave them open to public criticism of trying to present information as more robust than it actually is⁶.

If the evidence based recommendations presented in this report are implemented this would result in a different conclusion. The 'Sikh' category would be ranked second on the list of ethnic group options and hence would need to be included by ONS as an ethnic group category in the 2011 Census questionnaire.

While the ONS draft questionnaire may in its view have been finalised, this report and its recommendations should be considered by Members of Parliament (MPs) in raising the matter again with ONS before voting on the regulation concerning the 2011 Census in February 2010. ONS are duty bound to consider the views of Parliamentarians. Parliamentarians and ONS must ensure that Sikhs are served fairly by the 2011 Census. If not the question will remain, can ONS be trusted with the 2011 Census?

⁵ Letwin welcomes Sikh political party: <http://news.bbc.co.uk/1/hi/uk/3108148.stm>
Letwin wants renewed status for Sikhs: <http://www.dailymail.co.uk/news/article-196050/Letwin-wants-renewed-status-Sikhs.html>

⁶ Selection principles for item inclusion and terminology for ethnicity, national identity and religion questions and classifications (obtained from ONS through the Freedom of Information Act)

2. Context

The 1991 Census marked a critical milestone by including a question on ethnicity; this in part set out a vision to ensure that the identity of citizens was considered and counted. An ONS Information Paper ⁷ outlined that the ethnic group question was not intended to establish the ethnic composition of the population as it might be understood by sociologists, but was designed to capture information relevant to the RRA.

Given the aforementioned objective it is fair to say that despite good intentions the 1991 and the amended 2001 ethnic origin question failed to accurately capture information in accordance with the RRA.

One of the key reasons for this failure was that contradictory to the RRA, Sikhs, one of the few legally recognised ethnic groups, were not classified as such. The 2011 Census presents the ONS with an opportunity to act in accordance with the law and in response to strongly repeated requests by the Sikh community and elected representatives. This is an opportunity for ONS to right a wrong; not for the benefit of the Sikh community but to ensure fair and equal treatment.

UK is home to the largest number of Sikhs in the world outside Punjab. There are estimated to be approximately 600,000 Sikhs living in the UK, yet the previous Census could only record 336,000 in England and Wales; where the vast majority of Sikhs live. Scotland has 6,600 Sikhs⁸ and Northern Ireland has 0.3% of people from 'Other religions and philosophies (including Sikhs)'⁹.

The British Sikh Consultative Forum stated that Sikhs need to be monitored on a UK-wide basis for securing their equal rights in a fair share of jobs across sectors, corrective action in areas such as health, drug abuse and crime²⁴. Indeed everyday people in England and Wales encounter, rely on or work in public services. This report presents evidence indicating that by remaining invisible to policy makers, researchers and service professionals Sikhs will continue to face systematic inequalities in the provision of public services.

⁷ Office for National Statistics Information paper Deciding which tick boxes to add to the ethnic group question in the 2011 England and Wales Census (2009)

⁸ Religious Breakdown of Scottish Census 2001:

<http://www.scotland.gov.uk/Publications/2005/02/20757/53570>

⁹ Northern Ireland Key Statistics (2002):

<http://www.nisranew.nisra.gov.uk/Census/pdf/Key%20Statistics%20ReportTables.pdf>

3. Report remit and purpose

This report explores the rationale, research evidence and service need for monitoring Sikhs as a distinct ethnic group within the 2011 Census. In order to draw comparisons and to adopt a consistent approach the report examines the ONS criteria used to select two new categories for the ethnic group question in the 2011 Census.

The research evidence and service needs presented in this report demonstrate the strength of need for separate monitoring. Specifically how it could result in tangible improvements from policy development through to service delivery in order to address inequalities. This report will contest the omission of the 'Sikh' category for the ethnic group question on the grounds of defined evidence that is applicable to the ONS criteria.

It is advised that the ONS consider the report and act on its' recommendations to rectify all omissions or mistakes. Parliamentarians are also being made aware of the findings in advance of Parliament making a final decision on the regulation for the 2011 Census. The report has also been sent to the Equality and Human Rights Commission (EHRC), to provide appropriate advice to the ONS in light of the findings and recommendations. In addition to this it will be widely circulated among Sikhs and the media for information.

4. Starting point

It is vital to be clear from the outset, for a group to constitute an 'ethnic group' as stated in the RRA (1976) it has to regard itself, and be regarded by others, as a distinct community by virtue of certain characteristics. Two of these characteristics are essential:

1. It has to have a long shared history of which the group is conscious as distinguishing it from other groups and the memory of which it keeps alive.
2. It has to have a cultural tradition of its own, including family and social customs and manners, often but not necessarily associated with religious observance.

In addition, the following characteristics could also be relevant:

- (a) either a common geographical origin or descent from a small number of common ancestors
- (b) a common language, which does not necessarily have to be peculiar to the group
- (c) a common literature peculiar to the group
- (d) a common religion different from that of neighbouring groups or from the general community surrounding it
- (e) the characteristic of being a minority or being an oppressed or a dominant group within a larger community.

25 years ago when the House of Lords applied the outlined characteristics in the *Mandla v Lee* case it resulted in Sikhs being defined as a legally recognised ethnic group.

This starting point of what constitutes an ethnic group is essential. Despite the legal criteria the practice in determining some ethnic groups has been with reference to a particular nation or region e.g. India, Pakistan and Bangladesh etc. Clearly the definition states that the unifying characteristics to define an ethnic group lay in a collection of people; a community. The ONS have rightly noted this in the case for Gypsy and Traveller people. While there may be variations with respect to personal or academic definitions quite clearly it is the legal definition which should determine the Census categories for ethnic groups. It is for this reason that this report has also been shared with lawyers to advise what, if any, legal action can be taken if ONS continue to exclude a 'Sikh' category for the ethnic question while retaining categories

that are not legally defined ethnic groups. ONS acknowledge that there was evidence that Sikhs suffer from *racial* discrimination, and that groups who do not have a tick box are disadvantaged by not being monitored as an ethnic group in their own right¹⁰.

¹⁰ Minutes of meeting between ONS and the British Sikh Community organisations Tuesday 24th April 2007 (information obtained from the ONS under the Freedom of Information Act)

5. Current position

Before World War I (WWI), the stigmatic term 'Hindoo' was the usual label for a community of around 5,000 strong in British Columbia, Canada. The adopted label was incorrect; similarities can alarmingly be drawn to the present day situation. If this term had been used in a Census it would not have been able to identify this community accurately. Almost all of this community were Sikh¹¹. The issue we face now, in 2010, is that in England and Wales the actual number of Sikhs is 120 times more than pre WWI British Columbia. There are estimated to be 600,000 Sikhs in England and Wales, yet the 2001 Census was only able to record 336,000.

Researchers have noted that there is a real need for the Census question on ethnicity to not only describe broad historical processes of colonialism and historic migration patterns, but also to ensure that the favoured terminology is acceptable to those being described (Aspinall, 2003)¹². Over a persistent period of around a decade Sikhs have demanded for the law to be applied in order to be considered a separate ethnic group. The ONS are acutely aware that the RRA protects on 'racial grounds' which includes defined colour, race, nationality and ethnic national origins. The ONS and Government need to carefully consider on what basis Sikhs are not monitored and then act to rectify this mistake.

We already know that Sikhs do not accept the current categorisation options, as illustrated during the ONS written consultation in 2006/07. The consultation resoundingly showed a 100% positive response rate for separate monitoring from all 154 representative Sikh organisations who participated from England and Wales. The 154 organisations and their thousands of members were not content to be categorised as 'Indian', 'Pakistani', 'White' etc. and through written consultation, on the request of ONS, made this known. 'Indian', 'Pakistani', 'White' etc. are not salient terms which 600,000 Sikhs identify with of their own accord.

The current options are for Sikhs to be measured incorrectly by either selecting the 'Indian', 'Pakistani', 'White' etc. categories or to write in a response. The latter option has often been cited by ONS as a viable way of capturing information when in correspondence with MPs who are trying to

¹¹ Measuring ethnicity in Canadian censuses. Statistics Canada and US Bureau of the Census eds. Challenges of measuring an ethnic world: proceedings of the joint Canada-United States conference on the measurement of ethnicity. (1993)

¹² Who is Asian? A category that remains contested in population and health research. Journal of Public Health Medicine Vol 25 No 2 (2003)

represent the needs of their constituents (See letter at Annex 1 sent by the national Statistician on 17 November 2009). The ONS Information Paper¹ however, recognises that the write in option '*in practice can lead to lower visibility of information on such groups*'. Importantly the write in option is often not considered for full analysis by service providers or even often by ONS for high level output analysis. To date the only two recommendations proposed by the ONS to monitor Sikhs as an ethnic group are deemed inadequate by either their own advice or by the law.

6. Prioritisation Tool

The Prioritisation Tool was intended to be a systematic process to arrive at a harmonised set of questions, definitions and outputs across the UK Censuses allowing bespoke aspects, if required⁷. The concept of the tool was to prioritise the requests received for additional ethnic group tick boxes between 2007-2008 in collaboration with the Welsh Assembly (WAG), the Scottish Government (SG), General Register Office for Scotland (GROS), Northern Ireland Statistics and Research Agency (NISA) and the Commission for Racial Equality (CRE)⁷.

The principles outlined in the tool were formed to enable all agencies the use of a consistent approach when deciding on new tick boxes for the ethnic group question. Although it was only in England and Wales that scoring was conducted. GROS decided not to use a scoring technique as it believed that this approach would be unlikely to aid Ministers and stakeholders appreciate the decision making process and evidence that underpins the final recommendations in 2008. In addition to this GROS outlined that scoring would result in overly reductionist findings that did not account for the range of evidence presented for each proposed ethnic group. GROS also noted that it may create a misperception that there is strong quantitative evidence leading to potential public criticism that there is an attempt to make the evidence base look more robust than it actually is⁶. It is important to note that the scoring applied resulted in two ethnic groups being formally proposed for inclusion in the 2011 Census questionnaire. While the principles of the tool appear to be well reasoned and coherent the evidence base for Sikh scores and the scoring process applied are inconsistent, contradictory and not transparent.

The ONS have outlined that due to financial and logistical reasons the 2011 Census ethnic group question only has the capacity to introduce two new ethnic group categories. At present the ONS formal proposal, documented in the draft questionnaire, sets out to introduce a category for Gypsy/Irish Travellers and one for Arabs. These categories have been selected due to their respective rankings of first and second achieved through the Prioritisation Tool (see annex 2). The ONS have not indicated whether the existing categories can be replaced if there is greater demand for a 'Sikh' category. However given the evidence presented in this section of the report it is clear that Parliament needs to act on the draft questionnaire presented to them to ensure that the correct decision is reached.

An Equality Impact Assessment¹³ commissioned by ONS for the Prioritisation Tool did not fully examine the impact of excluding a legally defined ethnic group who have demanded separate monitoring. As a result of this the proposals for Sikhs lack sufficient rigour and accuracy in effective monitoring.

The overarching scoring system for the Prioritisation Tool used three levels of score. The ONS gave a score (2,1,0) to each of the principles outlined in the Prioritisation Tool¹. The level of score was intended to be dependent on the evidence collated by ONS for each proposed ethnic group:

2	High level of evidence
1	Medium level of evidence
0	Low level or no evidence

Table 1: ONS Prioritisation Tool Scoring Criteria

¹³ Equality Impact Assessment, Ethnicity, National Identity, Language and Religion Question Development 2011 Census in England and Wales (2008)

7. Four themes of the ONS Prioritisation Tool

This section of the report outlines the Prioritisation Tool's four themes and explores the rationale for scores allocated to the 'Sikh' category and provides recommendations to address any shortcomings. Annex 2 presents the summary of scores for all proposed ethnic groups.

The ONS have jointly ranked the 'Sikh' category in 8th position with 'Cornish' and 'White Chinese'. It is from this overall ranking that further examination was conducted to probe the reasoning and evidence for why a legally defined separate ethnic group which has the support of the Sikh community and Parliamentarians was ranked so low.

The four themes of the Prioritisation Tool are:

1. Strength of need
2. Lack of alternative sources
3. Clarity, quality and acceptability
4. Comparability over time

Within each theme there are seven principles which receive a score, please see annex 2 in order to view the seven principles.

7.1 *Theme 1 - Strength of need*

The need to be monitored separately is critical for the lives of every one of the estimated 600,000 Sikhs in England and Wales. It is now best practice for policy development and service delivery to be equality impact assessed to comply with the Equality Act, Sex Discrimination Act, Disability Discrimination Act and the RRA. The UK's report to the United Nations Committee on the Rights of the Child (UNCRC) found that 31% of Sikh children felt unfairly discriminated against. This is one example that shows the real terms impact on Sikhs can never truly be both examined and acted upon if they are not monitored along with other ethnic groups. In effect Sikhs are invisible on paper to the 40,000 public bodies that design, plan or deliver public services.

The Prioritisation Tool also considered the importance of both policy development and service delivery. Special interest Sikh groups had requested

for separate monitoring on the basis of fair and equal provision of public services as had Arab groups. The Prioritisation Tool⁴ did not indicate any policy or service specific demand or need for including an 'Arab' category, yet there was a stark contrast in the scores obtained for the strength of need theme. A 'Sikh' category scored a total of 2 while the 'Arab' category scored a total of 4.

This report has examined the policy development need (annex 2 principle 1.2) for separate Sikh monitoring. Annex 3 sets out a high level policy review of key areas suggesting the need for separate monitoring of Sikhs. At a meeting with senior ONS officials in April 2007 it was suggested such information would be helpful to ONS to justify the need for Sikh monitoring. This information was provided to ONS in May 2007. In respect of service delivery (annex 2 principle 2.1) please also refer to annex 4 which presents an example of how the service delivery of healthcare needs to consider Sikhs as a separate ethnic group.

The statutory Code of Practice on monitoring issued by the CRE strongly advised the use of the 2001 Census categories. Sikhs lobbied to ensure the CRE and ONS guidance made reference to the fact that Sikhs constituted a separate ethnic group and could be monitored. However, virtually all public bodies have chosen to collect ethnicity information using categories that are in line with the ethnic group classifications used in the 2001 Census and not to collect any information on Sikhs. It is understood that the ethnic group categories from the 2011 Census will again be drawn upon by public bodies as the basis for policy development, service planning and delivery. This trend will be replicated by researchers who will seek to use their field's terminology to publish research evidence. Thus every part of the service cycle; research, policy and delivery will yet again ignore the specific needs of Sikhs.

In the absence of data on Sikhs as an ethnic group, Sikh organisations have found it difficult to work with different public bodies at all levels – government departments and agencies, local authorities, police, schools, colleges, hospitals etc. to determine whether members of the Sikh community are receiving equal access to services.

7.1.2 Recommendation 1

The 'Sikh' category generated a total score of 2 out of 4 for the strength of need theme. The Prioritisation Tool⁷ recorded a score of 1 for principle 1.1 in annex 2. This means that there is *some* evidence or indication that the group is experiencing some disadvantage or that there is particular policy interest.

On the basis of evidence presented in annex 3 and 4 of this report it is recommended that the score should be 2. A score of 2 would accurately reflect that strong evidence exists that Sikhs experience significant disadvantage in one or more areas of life or that there is particular policy interest.

The Prioritisation Tool⁴ records a score of 1 for principle 1.2 in annex 2. This means that there is some evidence or indication that the group is of particular interest for service delivery. On the basis of evidence presented in annex 3 and 4 of this report it is recommended that the score should be 2, which would mean that there is strong evidence as opposed to some evidence. A scoring of 2 would best describe the status of current evidence.

It is recommended that the 'Sikh' category should receive a total score of 4 for the strength of need theme to reflect the evidence outlined in section 7.1, annex 3 and 4.

7.2 Theme 2 - Lack of alternative sources

It is noted that the Census should be a streamlined questionnaire that is simple, clear and avoids the duplication of information. Thus the use of a proxy measure to aid data collection for a dual purpose could be deemed viable but only if the alternatives to monitoring Sikhs were able to capture the real reflection of Sikhs in England and Wales. In practice however a viable proxy measure does not exist in the current proposals.

A useful proxy measure would provide information that is close enough to reflect similarly to an actual measure. Prior experience and findings have indicated that the alternative sources are not sufficient to act as a meaningful or appropriate proxy whether this is on an operational, legal or statistical basis.

The ONS use of the Prioritisation Tool resulted in the 'Sikh' category receiving a score of 0 for other Census information being inadequate (annex 2 principle 2.2). This score means that the ONS consider that relevant proxy measures for Sikhs are already available for use in the Census. It is stated that the 'Indian' tick box, religious affiliation question and write in response could be used in place of a Sikh category in the ethnic group question. This section presents evidence as to why the proposed measures would not in any way be adequate let alone effective proxy measures.

7.2.1 Write in response

Consistent with research¹⁵ when people are prompted to select an answer as opposed to an open ended question the forced choice produces a forced answer. 91% of Sikhs selected 'Indian' for their ethnic group and 11,000 people in England and Wales opted to write in 'Sikh'. Thus only 3% of Sikhs used the write in response option. The scoring (2) for this section (annex 2 principle 2.1) illustrates the inadequacy associated with capturing information through the write in response method. As stated previously the ONS acknowledge that the write in response fails to capture the vast majority of individuals and at best is only analysed in a category defined as 'Other ethnic group'. Yet the use of the write in box is the advice ONS provide Sikhs and MPs (Annex 1). The Gypsy or Irish Traveller group also presented limited use of the write in response 1,858 people in this category used the write in option in the 2001 Census, this was one of the key reasons for selecting the Gypsy or Irish Traveller group to be selected as a separate category.

7.2.2 Indian tick box

At present by selecting the 'Indian' option Sikhs will be contributing to the over-counting of Indians. Much as the same would occur if White Irish was teamed with White British or White Other. ONS have often cited⁷ that 91% of Sikhs ticked the 'Indian' ethnic origin tick box. Inaccurate options for a forced choice question will produce a forced answer not necessarily the real answers¹⁴. Research also indicates that when general practice staff asked patients to describe their ethnicity only 43 patients described themselves as Indian of their own accord but when prompted with the Census options from 1991 it increased more than four-fold to 180¹⁵. While the majority of Sikhs may tick the 'Indian' box it is a poor proxy measure, which creates an over-estimation of a different ethnic group. It is recognised that in order to compare and contrast groups as well as to have a degree of consistency tick box options are required. However these options must allow for large numbers of people to reflect their ethnic identity accurately.

It is important to note that the majority of Sikhs in the UK are not in fact born in India and have distinct cultures, norms and personal identities compared to Indians. The 2001 Census reported Sikhs are the most likely of all the

¹⁴ A conceptual primer: Beginning Behavioural Research eds (2002)

¹⁵ Ethnic group data collection in primary care: problems and solutions. University of Nottingham (1995)

Asian religions to have been born in the UK. Over half (56%) of the Sikh community in 2001 had been born in the UK, with 35% born in India¹⁶. Given migration and demographic patterns over the last 10 years by 2011 around two-thirds to three-quarters of all Sikhs living in the UK are expected to have been born here. It is deeply offensive and reinforces a colonial mentality at ONS to 'force' the majority of Sikhs to incorrectly select the 'Indian' ethnic option. Hindus are the least likely of all the religious groups to have been born in the UK, followed by Muslims and Buddhists¹⁶. Therefore the religious group that is most likely to be born in the UK and the religious group that is least likely to be born in the UK are to be classified in one ethnic group. The impact of this in respect of defining specific service needs is likely to lead to significantly contradictory or broad-brush delivery plans by public bodies.

7.2.3 Religious affiliation

It is often stated that the optional religious affiliation question measures the majority of Sikhs. Thus it is suggested that this is the best proxy measure. In 2001 the religious affiliation question recorded 336,000 Sikhs, while the actual number of Sikhs ranged from a conservative estimate of 500,000¹⁷ through to potentially 700,000¹⁸ (for the purpose of this report the average figure from the range has been used: 600,000), as indicated to the Select Committee for Work and Pensions in 2003¹⁸. This range is documented in academic journals such as the Cambridge Research article mentioned in the evidence to the Select Committee⁸ through to community based evidence. At the time of the 1991 Census it was estimated by central government bodies that the Sikh population was around 400,000 so the 2001 Census proxy measure produced a perverse and inaccurate result for the number of Sikhs. This was acknowledged by Len Cook, the former National Statistician at a meeting with Sikh community representatives in April 2003 when discussing the results for the Census 2001.

When Kent County Council were exploring community demand for the refurbishment and improvement of Guru Nanak Day Centre preliminary investigations found that the Census figure grossly underestimated the actual figure of Sikhs. A more accurate figure of the total Sikh population of a

¹⁶ Country of Birth and Religion 2001 Census: <http://www.statistics.gov.uk/ci/nugget.asp?id=958>

¹⁷ House of Lords Debate (2009): http://www.publications.parliament.uk/cgi-bin/newhtml_hl?DB=semukparl&STEMMER=en&WORDS=sikh&ALL=sikh&ANY=&PHRASE=&CATEGORIES=&SIMPLE=&SPEAKER=&COLOUR=red&STYLE=s&ANCHOR=91215-0010.htm_spnew1&URL=/pa/ld200910/ldhansrd/text/91215-0010.htm#91215-0010.htm_spnew1

¹⁸ British Sikh Federation Memorandum presented to the Work and Pensions Select Committee (2003): <http://www.publications.parliament.uk/pa/cm200405/cmselect/cmworpen/268/268we14.htm>

particular constituency, for instance Gravesham, can be formed by considering the number of Sikhs on the electoral register (approximately 4,500¹⁹) and then adding the average number of minors which is 1.5 times more than the electoral register figure; this produces a conservative total Sikh population of Gravesham of 11,250. The 2001 Census best estimate of Sikhs in Gravesham was 6,372. Therefore the Census undercounted Sikhs in Gravesham by 4,880 which is approximately 44% less than the electoral register proxy measure. Given that the 2001 Census found that Sikh families tend to have a much higher proportion of young people than the average family in England and Wales it is highly probable that the undercounting of Sikhs is higher than the conservative estimate of 44%. Nevertheless this finding is consistent with the national estimate of the Sikh population of 600,000 in comparison to the 2001 Census figure of 336,000; which is also an undercount of 44%. Unlike the ethnic group question the religious affiliation question is not mandatory. Given that the latest 'Sikh' figure generated from the 2001 Census underestimates by 44%, the assertion made in the ONS Information Paper⁷ that the religion question may provide a larger count than the mandatory ethnic group question is ill founded. A nationwide analysis for the number of Sikhs will be required particularly as all public bodies (local and national) use the Census information as a baseline.

In summary the religious affiliation question does not provide a reliable indication of the number of Sikhs in England or Wales. The final outcome produced by this question only accounted for approximately half of the real figure. The face validity of the 2001 Census is highly questionable. The figure of 336,000 was met with both concern and scepticism by the Sikh community and a number of MPs, hence the considerable number of separate monitoring requests and lobbies.

7.2.3 Recommendation 2

The ONS Information Paper⁷ recorded a score of 0 for point 2.2 in annex 2. This means that the ONS hold the view that the group will be captured almost entirely by a single alternative census question. It is proposed that in light of the evidence presented above the scoring for point 2.2 in annex 2 should be 2. The scores for this theme are weighted greater than other themes as this theme is deemed to be more important. Therefore an inaccurate score of 0 has a particularly adverse effect.

¹⁹ Borough of Gravesham Register of Electors 2007 (reviewed by local Councillor for estimated figure).

The approach adopted by ONS did not evaluate or probe information sufficiently to form accurate conclusions. Established evidence appears not to have been considered, thus creating skewed scores.

The outlined evidence presented illustrates that a scoring of 0 on the Prioritisation Tool is clearly incorrect (principle 2.2 in annex 2). The other available information from the Census would not act as a good proxy measure. The nearest proxy measure underestimates the Sikh population by half, on this basis it is recommended that the scoring should be corrected.

It is recommended that a score of 2 is attributed to the 'Sikh' category for the principle of other Census information being inadequate (principle 2.2 in annex 2) as this would be a true reflection of the current status which is that no other census question could be used as a proxy.

7.3 Theme 3 - Clarity, quality and acceptability

It is vital to consider the respondent's perspective in order to ensure that people are able to respond accurately and with ease. It is therefore imperative that the Census reduces any potential confusion and only introduces categories that are acceptable to those they seek to represent. This will generate high quality and accurate data.

It is important that any questionnaire produces valid results. The extent to which a questionnaire measures what it claims to measure is critical. It is only valid questionnaires that can produce results which can be accurately applied and interpreted. In order to determine whether a questionnaire really produces valid results a body of research is required to demonstrate the relationship between the questionnaire and what it is intended to measure¹⁴. Imagine if a questionnaire's validity was not fully examined yet the results were applied for the basis of public service allocation and analysing national trends, it would inevitably lead to mistaken conclusions. Yet when considering Sikh monitoring this is the very state of affairs with the Census 2011 proposals.

ONS drew evidence from cognitive testing, stakeholder communication and analysis of the 2001 write in responses. However considering the Census is a nationwide survey with a response rate of many millions; the evidence obtained was not fit for purpose. Testing was grossly limited and findings from single figure samples have been generalised to apply to hundreds of thousands.

Within this theme the 'Sikh' category was severely marked down (annex 2 principles 3.1 and 3.2) from a potential score total of 4 the 'Sikh' category scored 0 for this theme. This means that the ONS believe there is already an obvious alternative option for this group and Sikhs are not burdened without an ethnic group tick-box.

Annex 2 principle 3.1 refers to whether individuals would be unduly confused or burdened and thus compromising the quality of information. Given that only half of the actual number of Sikhs were counted in the 2001 Census by the optional religious question, it brings into question whether the 'obvious alternative' is as obvious to Sikh respondents or perhaps just the ONS.

Annex 2 principle 3.2 refers to whether the addition of the tick box is clear and acceptable to respondents and provides the required information to an acceptable level of quality. The 'Sikh' category has a score of 0 which means that there is evidence that the tick box is not clear or acceptable to *all* respondents and that there is some confusion; a proportion for which the tick box is intended might tick another box. The information presented below contests these scores.

7.3.2 Cognitive testing and field tests

The Prioritisation Tool⁷ included evidence of cognitive testing which was conducted in order to investigate respondents thinking processes and views while completing a range of tests on their ethnicity. The ONS also outlined that during cognitive testing most Sikhs wished to record their ethnicity as Indian. However what the ONS failed to mention was that the total number of Sikh respondents was seven. A finding produced from only seven Sikhs in Scotland was used to generalise the options presented for approximately 600,000²⁰ Sikhs in England and Wales. Despite continuous Sikh demands for separate monitoring the ONS did not conduct its own cognitive testing, instead it generalised results produced from a project commissioned by the General Register Office for Scotland (GROS).

The cognitive testing for Sikhs was conducted in Scotland but the ONS used the information for the England and Wales Census. The Scottish Sikhs who recorded themselves as Indian would not obviously be completing the England and Wales 2011 Census questionnaire. In fact the cognitive testing noted that the sample of respondents was designed to reflect the range of

²⁰ Cognitive Testing for Scotland's Census Ethnicity Classification:
<http://www.scotland.gov.uk/Publications/2008/03/13131959/4> (2008)

groups in *Scotland*. What is alarming is that cognitive testing results were generalised from a statistically non representative sample of merely seven people to apply to a different population of approximately 600,000 Sikhs in England and Wales. The cognitive testing results were noted as contributing to the overall score for annex 2 principles 3.1 and 3.2.

For the 'Arab' category similar cognitive testing with Somalis in Wales indicated that respondents showed confusion between classifying their ethnic group²¹. When the sample of 14 was questioned verbally in terms of how they saw their own ethnicity *all* stated their ethnic group was Somali. The sample sizes for both Sikhs and Arabs were extremely small to generalise results, yet this is precisely what occurred.

The 'Arab' cognitive testing drew on a sample that is likely to be eligible to complete the 2011 England and Wales Census and was double the size of the 'Sikh' category testing. Despite the significant methodological flaws evidence was used from the Wales testing to suggest that a maximum score of 2 was appropriate for the 'Arab' category, even though all described their ethnicity as Somali. While evidence from the 'Sikh' category testing, for which some recorded themselves as Sikh given the choice, was used to produce a score of 0 (annex 2, principles 3.1 and 3.2).

The cognitive testing evidence for the 'Sikh' category is doubly inaccurate (sample size was too small, in fact half of the size used for the 'Arab' category, and not from England or Wales) compared to the 'Arab' category. In addition if the cognitive testing results were to be used how can a sample which produces 0% response rate when asked verbally ('Arab') for describing an ethnicity score a maximum of 2 while a minimum score of 0 is attributed to a group where some have responded to state 'Sikh'.

In addition to the bespoke yet ineffective cognitive tests the ONS conducted field tests of the proposed 2011 Census in 2007, the local authorities selected were Camden, Liverpool, Bath, North East Somerset and Stoke²². The field tests acted as a dress rehearsal for the whole 2011 Census (not only the ethnic group question). While these areas may be representative of the country's various economic statuses they are not reflective of Sikhs in many other cities

²¹ Welsh Assembly Government Cognitive Testing

http://docs.google.com/viewer?a=v&q=cache:m02A68pF1tAJ:www.ons.gov.uk/census/2011-census/consultations/user-adv-groups/census-adv-groups/general/eth-test-wales-by-wag.pdf+wales+cognitive+testing+somali+and+arab&hl=en&gl=uk&pid=bl&srcid=ADGEEsjNO4cbi_i5CJlVgvJxjUkEV53hje-n9Qh1Vj1SoqTaOEaEVPi9BdFbg-3hHFv2HpxZOvOmX3UBPXUAF5VPi9BdFbg-dOzS5nbGxW3XuopFrcFzAkY1d90LNxg3wi552TWE&sig=AHIEtbRIqhaZgqbSEqzWCWwsSzWtemRS cA

²² 2007 Test <http://www.ons.gov.uk/census/2011-census/2011-census-project/2007-test>

and towns; such as Birmingham, Wolverhampton or Slough. It is understood that the ONS field tests were insufficient in regards to ethnic monitoring; hence specific consultation was carried out towards the end of 2006 and the start of 2007 on this subject.

The field test findings revealed that of a sample of 702 people born in Arab league states (Algeria, Morocco, Egypt, Libya, Tunisia, Sudan and Somalia) only 23% selected 'Arab' as their ethnic group²³. The majority of those born in Arab league states selected 'African' (29%). Even when presented with an 'Arab' category, 25% of those who the ONS predicted would select this category actually recorded no response at all, used the 'any other' option or multi-ticked between a selection of categories. These findings indicate that the 'Arab' category is not fit for purpose. More specifically there are clear differences between the Arab league states. The majority of those born in Sudan or Somalia prefer the 'African' option. Those born in Algeria were still more likely to multi-tick as opposed to select the 'Arab' category alone. Those born in Tunisia indicated no clear preference and selected 'Arab' in equal measure to 'Other White' and 'British'. However contrary to what was found during the field test the findings were used to indicate acceptability for the 'Arab' category.

The field test findings are particularly pertinent in comparison to the 2006 Scottish Census Test (in essence Scotland's field test). The 2006 Scottish Census Test found that of all those who recorded their religion as Sikh the majority (62%) identified as Sikh only. This was despite the fact that the 2006 Scottish Census Test had an increased likelihood of multi-ticking, as it had a 'European' section heading not 'White' (European-Scottish and Asian-Sikh)²⁴. Therefore the percentage that only selected the 'Sikh' category is likely to increase further if this flaw was addressed. This methodological flaw was noted by ONS. The 2006 Scottish Census Test found that less than 3% of *all* respondents ticked two or more categories and did not note any trend of the selection of multi-ticked categories (i.e. Sikh-Indian)²⁵, which was a concern of the ONS.

7.3.3 Focus groups and stakeholder meetings

ONS also state that focus groups and stakeholder meetings took place and were considered for the theme of clarity, quality and acceptability. ONS conducted a written consultation exercise to determine the views of those in

²³ Other ethnic group: Arab (document provided by ONS under Freedom of Information Act)

²⁴ Asian Sikh (document obtained from ONS by the Freedom of Information Act)

²⁵ The Scottish Census Test: How well did respondents complete the questionnaire? (2006)

special interest groups; unfortunately the ONS did not allow for the recommended 90 days for consultation and chose to hold the exercise over a 30-day period during Christmas and the New Year period, although this was extended when ONS realised its mistake or when they realised there was a concerted response from Sikh organisations.

Following the extension 606 organisations²⁶ responded from a cross section of ethnic groups and public bodies, 154 were Sikh organisations -all are believed to have all responded in the first 30 days. All 154 Sikh organisations demanded to be monitored separately, therefore of all responses 1 in 4 requested separate Sikh monitoring. If ONS had not extended its deadline for responses well over 50% of all responses are believed to have been from Sikh organisations. Clearly a score of '0' for this theme indicates this strong evidence was not considered by the Prioritisation Tool. The ONS have stated that only unique responses were analysed, thereby excluding the vast majority of Sikh feedback as they presented consistent standardised arguments across their range of responses. To our knowledge every Sikh organisation that responded has its own local or national management structure and the decision by ONS demonstrates it was determined to diminish the response from Sikh organisations to its own consultation. The perverse decision to only consider 'unique' responses should have been communicated to stakeholders at the outset of the exercise and not retrospectively.

The goal posts moved significantly after the consultation period had ended and the issuing of the report that was promised in July 2007 deliberately delayed until almost 7 months after the extended consultation period had ended. In our view this was a totally unacceptable approach by ONS and is viewed by many as a conspiracy to avoid ONS accountability to Parliament at two large Sikh lobbies of Parliament in July 2007 and October 2007. It was more than ironic that the report was released by ONS the day after the second lobby in October 2007. The consultation exercise and the release of the results left Sikh organisations that responded totally frustrated with what appeared to be unfair treatment of the Sikhs.

The ONS also state that many special interest groups, experts, national and local government authorities reported that the inclusion of additional categories in the Scottish 2006 Census Test (including Sikhs) provided more detailed information and clarity on individual ethnic groups²⁶. This is particularly pertinent as while the ONS often state that the inclusion of a 'Sikh' category in the ethnic group question may cause confusion with

²⁶ Ethnic Group, National Identity, Religion and Language consultation Summary report on responses to the 2011 Census stakeholders consultation 2006/2007

respondents (based on testing in Scotland with a sample of seven and disregarding written consultation evidence) the data users have noted its merits. The ONS consultation on the Scottish 2006 Census Test also found that respondents had problems with identifying African and Arab/Middle Eastern tick boxes, however the Prioritisation Tool failed to include the confusion in respect of the 'Arab' category²⁶. In addition to this consultation with the Somali community has revealed that they found the 'African' category was sufficient²⁷.

Within the consultation preparation work conducted by the ONS it was acknowledged that racial terminology is deemed less appropriate for the Census as a concept as it involves imposing categorisation on an individual by others²⁷. Yet the current draft questionnaire for the 2011 Census is imposing a category on a legally defined ethnic group who wish to be regarded separately.

ONS consultation respondents from central and devolved government indicated that more detailed information was required either through refining categories or introducing new categories for Sikhs²⁸. The Defence Analytical Services Agency specifically noted a distinction between Sikhs and non-Sikh Indians for employment monitoring²⁸. If this finding is considered jointly with the fact that the Department of Health (DH) stated that ethnicity indicators significantly explain need in the various models used for resource allocation it is critical to monitor Sikhs separately.

In addition to the ONS consultation processes a number of high profile lobbies, Early Day Motions and Parliamentary Questions have been raised in support of separate Sikh monitoring. Over 200 MPs from across the political spectrum have publicly indicated their support. The Conservative and Liberal Democrat parties and many Labour MPs have also expressed their support for the need for a separate ethnic category tick box for Sikhs that ONS appear to have ignored. This information was not considered by the Prioritisation Tool. The very democratic process which enables constituents and MPs to have constructive dialogue with the State was never utilised or even accounted for within the Prioritisation Tool. If it were then the score of 0 ignores the voice of 1 in 4 of all respondents from the ONS written consultation exercise, hundreds of MPs and those who have participated in numerous lobbies.

²⁷ Final recommended questions for the 2011 Census in England and Wales. Ethnic Group (2009)

²⁸ Ethnic Group, National Identity, Religion and Language consultation central and devolved Government responses Summary report on responses to the 2011 Census stakeholder consultation

7.3.4 Recommendation 3

It is recommended that scoring for annex 2 principle 3.1 and 3.2 should be 1 (for each principle respectively) as the ONS description for this score best encapsulates the current situation. A score of 1 for principle 3.1 would denote that the majority of this group would select a single alternative. In addition to this a score of 1 for principle 3.2 would mean that *some* respondents may not find the tick box clear or acceptable. The basis for these scores would acknowledge that there is an alternative but the suitability of this alternative is not accurate in the eyes of Sikhs, the law and the ethnic group definition.

In light of the evidence presented in section 7.2 it is therefore recommended that this theme generates a total of 2 (1 score each for principles 3.1 and 3.2 referred to in annex 2). It is also recommended that either the 'Arab' score of 2 is reviewed in light of information presented in section 7.3.2 or that the insufficient cognitive testing findings are excluded for both the 'Sikh' category and the 'Arab' category.

7.4 Theme 4 - Comparability with 2001 data

The Prioritisation Tool notes that in order to determine trends and patterns over time the categories require a degree of comparability with the 2001 data. It is acknowledged that the introduction of a 'Sikh' category will impact comparisons over time however the effects can be reliably estimated and considered. Thus the score of 1 attributed to this theme appears to be reasonable and most fitting of the various score options.

It is acknowledged that the introduction of a 'Sikh' category will impact comparisons over time however the effects can be reliably estimated and considered. Thus the score of 1 attributed to this theme appears to be reasonable and most fitting of the various score options.

Sikh ethnic monitoring in the 2011 Census is essential as it is a pre-requisite for public bodies to then systematically collect and analyse data for Sikhs as an ethnic group in order to highlight possible inequalities, investigate their underlying causes and remove any unfairness or disadvantage to members of the Sikh community. Public bodies have noted that it is imperative to collate data on visible minorities to examine discrimination that occurs and to put in place effective measures to counteract such prejudice behaviour²⁹. The

²⁹ <http://news.bbc.co.uk/1/hi/uk/3108148.stm>

Census lays the foundation for ethnic monitoring and provides a baseline against which all other statistics can be measured. With this in mind appropriate action should be taken to address the numerous inaccurate conclusions drawn from the Prioritisation Tool.

8. Conclusion

The report acknowledges that logistical and financial constraints on the 2011 Census mean that a streamlined evidence based approach is required to determine which ethnic groups can be included. The themes used by the Prioritisation Tool offer a sound basis for reviewing and evaluating relevant material. However the execution of the tool did not adopt coherent, consistent and rigorous assessment of information and as such has resulted in incorrect results with an adverse impact on Sikhs.

If the evidence based recommendations presented in the report are implemented then this would result in much of the situation being rectified. The 'Sikh' category would be in second ranking (with a score of 17) on the list of ethnic group options and therefore should be included as a separate category in the 2011 Census.

It is vital that Parliamentarians review the findings of this report and ensure that ONS abide by their duty to consider their views. In the interest of equality and fairness it is critical that the final selection of ethnic group categories for the 2011 Census are based on clear, consistent, and well reasoned evidence-based recommendations. Therefore upon consideration of the findings of this report appropriate action should be put in place. It is also important that the Equality and Human Rights Commission (EHRC) advise ONS on potential options to rectify the oversights to date and to ensure that Sikhs will be served fairly by Census 2011.

There are three distinct stakeholders that will directly benefit from having information on Sikh ethnic monitoring – public bodies, Sikh organisations and last but by no means least the Sikh community itself. The wider public will also benefit if inequalities can be removed and greater fairness ensured.

Annex 1. ONS Letter on Separate Sikh Monitoring



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Rt Hon Elliot Morley, MP
House of Commons
London
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Your Ref: em/pc/SING01002/01090635

17 November 2009

Dear Mr Morley

Thank you for your letter of 6 November addressed to Angela Smith MP on behalf of your constituent Hardev Singh of 232 Ashby Road, Scunthorpe, concerning a Sikh category in the religion question in the 2011 Census.

As in the 2001 Census, Sikhs will be able to identify themselves in the 2011 Census, by using the tick-box response to the religion question. There are no plans to include a separate category for Sikh in the ethnic group question, but there is a 'write-in' option which will provide the opportunity for people to also describe their ethnic group as 'Sikh' if they wish to do so.

Yours sincerely

Jill Matheson

Building Trust in Statistics
Meithain Ymddiriedaeth mewn Ystadegau

Annex 2. Summary of scores

Principles listed from 1.1-4.1

	Unweighted Total	Weighted total (alternative sources 50 per cent of total)	1.1 Interest for equality monitoring/ policy development	1.2 Interest for service delivery	2.1 Write-in answers inadequate	2.2 Other Census information inadequate	3.1 Without this tick-box respondents would be confused or burdened	3.2 Addition of the tick-box and/or revised terminology acceptable	4.1 No adverse impact on comparability with 2001
Weighting			X 1	X 1	X 2.5	X 2.5	X 1	X 1	X 1
Gypsy or Irish Traveller	12	18	2	2	2	2	2	1	1
Arab	10	16	1	1	2	2	2	1	1
African + write-in	9	13.5	1	2	2	1	0	1	2
Kashmiri	8	12.5	1	1	2	1	0	1	2
Eastern European	8	9.5	2	2	0	1	0	1	2
East African Asian	5	9.5	0	0	2	1	1	0	1
Black and Asian	6	9	0	0	0	2	0	2	2
Jewish	6	9	1	1	2	0	0	1	1
Latin American	6	9	0	1	1	1	0	1	2
Polish	7	8.5	1	1	0	1	0	2	2
Cornish	5	8	0	0	2	0	0	1	2
White and Chinese	5	8	0	0	1	1	1	1	1
Sikh	5	8	1	1	2	0	0	0	1
Vietnamese	6	7.5	0	1	0	1	0	2	2
Iranian	5	6.5	0	0	0	1	0	2	2
Kurdish	5	6.5	0	0	0	1	0	2	2
Non-European White	5	6.5	0	0	0	1	0	2	2
Black British	3	6	0	0	0	2	1	0	0
Greek/Greek Cypriot	4	5.5	0	0	0	1	0	1	2
Nepalese	4	5.5	0	0	0	1	0	1	2
Sri Lankan	4	5.5	0	0	0	1	0	1	2
Turkish/Turkish Cypriot	4	5.5	0	0	0	1	0	1	2

0= Low level of evidence

1= Medium level of evidence

2 High level of evidence

Annex 3. Policy development and separate Sikh monitoring

A range of examples of how Sikhs have been denied equal provision of services for different sectors are given below:

Schools and higher education establishments

Collection of data for genuine and significant ethnic groups, such as the Sikhs, is important to raise the level of educational attainment of pupils. Schools use this information to see how well different groups perform at different stages while at school. They also use this information to monitor other policies such as; those for attendance and exclusions, to make sure that all pupils are treated fairly and that no single group is missing out or is not attending school.

Analysing this information helps schools monitor and improve their own practices and also celebrate the success achieved by pupils. Local Education Authorities and the Department for Education and Skills³⁰ use local and national data to; analyse trends in performance, make comparisons, set meaningful targets for performance or improvement and to deploy resources effectively.

As a direct result of the 2001 Census categories schools (and higher education establishments) do not monitor Sikhs as an ethnic group. Sikh children and students have therefore been denied a level playing field. Where Sikh organisations have decided to take up government initiatives, such as faith schools, for example in Slough, they have experienced considerable difficulties in presenting data in the absence of reliable information on; the number, age profile and attainment of Sikh children in different schools. This has delayed and in some cases prevented applications to set up Sikh schools.

Employment

Ethnic monitoring is a necessary tool for employers to investigate, examine and interrogate patterns of recruitment, retention and progression for each ethnic group. An organisation that encourages job applications from under-represented ethnic groups, e.g. Sikhs, may be wasting its time and money (and possibly doing more harm than good) if the real reason for their under-representation is that they are already applying, but being rejected, for whatever reason.

Monitoring by employers allows them to examine the ethnic make-up of their workforce and compare this with the data to be used as a benchmark. The Census and related surveys by the ONS regarding ethnic groups are the best

³⁰ This annex was provided to the ONS in May 2007, before Machinery of Government changes, hence the reference to the Department for Education and Skills

sources to set meaningful benchmarks that allow employers to analyse how their personnel practices and procedures affect different ethnic groups, such as the Sikhs.

It has been highlighted that the Government's Cabinet Office Performance and Innovation Unit Scoping note that Sikhs are more likely to be unemployed, less well represented in top status jobs, and less well paid. The CRE had reported that the Government Cabinet Office Strategy Unit report Ethnic Minorities in the Labour Market, that even after controlling for a range of factors the unemployment rate for Sikhs is twice as high as for Indian Hindus.

Ethnic monitoring of Sikhs will also have wider benefits too. In employment, ethnic monitoring of Sikhs will allow barriers to be spotted that are preventing employers from making use of available talent. It will also help employers to avoid what could be costly complaints of racial discrimination, by making sure that employers pick up and tackle problems at an early stage. The costs of discrimination claims can include; legal fees, compensation payments, and management time, not to speak of the emotional distress for those involved as well as possible wider damage to staff morale.

Service delivery

In service delivery, monitoring is fundamental to all public bodies to tell them which groups are using services, and how satisfied they are with them. Monitoring by public bodies allows them to then consider ways of reaching under-represented groups, such as Sikhs, and making sure that the services offered are relevant to their needs and provided fairly.

Ethnic monitoring of Sikhs will tell public bodies whether they are offering equality of opportunity and treatment to Sikhs. It can also tell them how and why they are falling short of this ideal. Public bodies can then work with Sikh organisations to concentrate on finding solutions and making changes, rather than ignoring the issue or using guesswork or assumptions.

Without ethnic monitoring, an organisation will never know whether its equal opportunities and race equality policies are working with regards to the Sikhs. To have an equality policy without ethnic monitoring is like aiming for good financial management without keeping financial records.

Police and criminal justice

There remain numerous allegations, particularly from police monitoring groups, that the criminal justice system as a whole, and the police in particular, discriminate against ethnic minorities. It is therefore essential to monitor every aspect of the criminal justice process. Whilst some police forces have a more extensive system of ethnic monitoring none cater for Sikhs

as an ethnic group. Monitoring covers four main areas: stop/searches, arrests, cautions, and homicides. Police forces are not in a position to supply any data for Sikhs in these areas.

Health and social care

Collecting, analysing and using ethnic group information on Sikhs and, where appropriate, related information on language and diet, is important for the following reasons. It is important for individual patients and service users:

- To contribute to assessments of individuals' needs and circumstances, thereby ensuring that access to services and service delivery can be as personalised and as appropriate as possible. For example, insights into a person's ethnic background e.g. Sikh - or the ethnic background of their family - may assist with diagnosis. Information about a person's main spoken language e.g. Punjabi and competency in English could indicate a need for translation and interpreting services. Ethnic monitoring of Sikhs will allow greater efficiency in the provision of; hospital meals, interpreting services, spiritual support and in improving preventive interventions.
- To assist with the clinical management of patients as the prevalence and course of many conditions varies by ethnicity. The collection of data on ethnic groups is well established and used extensively for epidemiological, clinical, and planning purposes. For other conditions and procedures, systematic monitoring of all users might identify the existence of under use when profiles of users are compared with those of the population in the area – the availability of Census information is critical in this sort of situation. A recent paper published in the British Medical Journal showed excessive referrals of certain patients, from a particular ethnic group, for gastroenterological investigation with no apparent clinical justification.
- To compare uptake of services between different groups to ensure fairness in allocation of resources and delivery of services according to needs and, where appropriate, to address health inequalities experienced by particular ethnic groups. By addressing health inequalities associated with Sikhs, trusts will be able to better contribute to national targets and meet local core standards. Likewise, councils can perform better. In recent years a number of key publications have highlighted the inequalities and, at times, discrimination experienced by ethnic minority patients (especially visible ethnic groups, such as the Sikhs), service users and communities. Most notably, these include :
 - 'They look after their own, don't they?', SSI/Department of Health, 1998;
 - 'The Health Survey for England: the Health of Minority Ethnic Groups 1999', National Statistics, 2001;

- various surveys published by the Healthcare Commission and its predecessors, a key report being 'Unpacking the patients' perspective: variations in NHS patient experience in England', Commission for Health Improvement, 2004; and

- 'Ethnic disparities in health and health care - a focused review of the evidence and selected examples of good practice', London Health Observatory, 2004

- To fulfil the organisation's public duty to promote race equality in general and to contribute to the organisation's Race Equality Scheme in particular.

Ethnic monitoring is also important for Sikh staff working in the NHS as it is the largest employer in Europe:

- To monitor fairness in recruitment and selection, learning and development opportunities, performance appraisal, and promotion.
- To identify under-represented groups e.g. Sikhs, so that recruitment drives can be targeted to increase the organisation's attractiveness to them. Overall, the NHS and social care has a good record in employing ethnic minority staff in general, but there are some marked differences within professional groups,
- To identify actual or potential groups of employees where positive action to, say, equip people from under-represented ethnic groups to apply for jobs or promotion, may be appropriate.
- To fulfil the organisation's duties as an employer in general and to contribute to the organisation's Race Equality Scheme in particular.

Through using data in these ways, and openly sharing results with the public, patient and user groups, staff and other stakeholders, Trusts and councils can demonstrate that data collections are not tokenistic or expensive exercises but can make a positive difference to individuals' experiences of the NHS and social care. This is true for ethnic group data be it on patients, service users or staff. Specific Sikh health needs are illustrated in annex 4.

Annex 4. Sikh differences in healthcare research and the impact on service delivery

Building on annex 3, healthcare has been selected as an example to demonstrate the need for separate Sikh monitoring. Healthcare research into inequalities predominately uses the Census categories for investigation, as the NHS employs the same categories in respect of service planning for minority groups. However of those select studies that examine within the Indian or Asian group a whole plethora of distinctions are found. The information presented in this annex is by no means an exhaustive investigation of Sikh health needs, it does however illustrate that there are definitive needs even in the mist of limited Sikh specific research. Evidence presented indicates higher risk of certain illnesses and associated mortality rates as well as specific care needs and provisions for Sikhs when in hospitals:

Liver Cirrhosis and Alcoholism

Research has indicated that alcoholic liver cirrhosis is a relatively common problem for 'Asian' men³¹. When this issue is examined at a more granular level, it is understood that of the 'Asian' men diagnosed with this disease the majority are Sikh³¹. An investigation was conducted in Birmingham which adopted the 1991 ethnicity categories as well as religious affiliation; the vast majority of the 'Asian' men sample was Sikh. Within the investigation there was almost double the number of 'Asians' who were cirrhotic compared to the ethnic makeup of the catchment population. The most common cause of cirrhosis was alcohol (61%). Analysis revealed that the proportions of 'Asians' with alcohol induced cirrhosis were significantly greater than would be expected if the alcoholic cirrhotics reflected the community at large. The 'Asian' men with alcohol induced cirrhosis were considerably younger than white men or any other ethnic group.

A recent article from the British Medical Journal (BMJ)³² stated that mortality as a result of alcohol consumption is particularly high in Irish, Scottish and 'Indian'. When further examined, the majority of those at risk in the 'Indian' category are Sikh men. Policy through to service delivery, on this issue, has been criticised for perpetuating a myth that alcohol related harm is low in all UK South Asians. As was the case in the Government report *Alcohol Harm Reduction Strategy for England*, this report classified Indian ethnic groups

³¹ Ethnic differences in cirrhosis of the liver in a British city: Alcoholic cirrhosis in South Asian Men. Medical Council on Alcohol (2003)

³² Alcohol use in South Asians in the UK (2009)

http://www.bmj.com/cgi/content/short/339/oct20_1/b4028?rss=1

Hindus, Sikhs, Pakistanis and Bangladeshis into one group. The standardised mortality ratio of deaths from alcoholic liver disease in South Asian men is almost four times that of British white men; Sikh men made up 80% of the mortality rate.

The implications of the outlined research indicate that there is a need to tackle alcoholism within the Sikh male population. The Alcohol Education and Research Council recommend stronger and more flexible links with stakeholders. Specifically from the affected minority groups, including the use of outreach work and residential rehabilitation services in addition to delivering messages through tailored media. Understanding how differences in religion, culture, history and socioeconomic status interact with biology is essential. Alcoholism and its estimated £20bn cost on the UK will remain an issue if minority groups are not monitored accurately for policy reports such as the *Alcohol Harm Reduction Strategy for England* through to medical and psycho-social interventions.

Cancer

Cancer affects 1 in 3 people in the UK³³. Research on the variations in risk between distinct South Asian groups is limited. However, the studies that have explored between these groups have found key distinctions in respect of awareness, attitudes and breast cancer risk.

It is only recently that the provision of appropriate cancer and palliative care services for minority ethnic groups has begun to be explored in any depth. One potential reason for this 'policy lag' is that traditionally cancer had not been seen as a major medical concern that was specific to minority ethnic groups. Recent epidemiological evidence demonstrates that lifestyles are changing, and that cancer is becoming a more significant problem among such communities. For example South Asian women in the UK have higher rates of breast cancer than those who are in the native population³⁴. Current trends indicate that second and third generation South Asian women in the UK are likely to be at higher risk than first generation migrants³⁴. Researchers and service planners need to be cognisant of the fact that Sikhs are more likely to be born in the UK than Hindus and Muslims. Separate Sikh monitoring will enable more relevant and forward thinking preventions and interventions to be put in place based on accurate and informed data in place of clumsy groupings.

³³ www.cancerresearch.org.uk

³⁴ Heterogeneity of breast cancer risk within the South Asian female population in England: a population-based case control study of first generation migrants. *British Journal of Cancer* (2004)

A study by Cancer Research UK demonstrated reduced risk of breast cancer in Punjabi Hindu women, and an increased risk for Punjabi Sikh women relative to Gujarati Hindu women, but neither of these associations were statistically significant³⁴. Although it is important to note that the sample size groups for the three outlined groups were not matched, in fact the Punjabi Sikh category had 100 participants less than the Gujarati Hindu category. Thus to notice a difference given the methodological limitations presents an area of interest and further work. The question which now arises is how can such potentially vital investigations take place, if the NHS only employs the 2011 Census categories for ethnicity?

As the needs of particular minority ethnic groups become clearer, questions relating to the nature and scope of cancer and palliative care services have moved to the forefront of the minority ethnic health care agenda.

An investigation into the perceptions of cancer and cancer services found that overall, knowledge of cancer varied among the participants (Hindus, Sikhs, Pakistanis and Bangladeshis) and there were distinct differences between the participant's focus groups³⁵. Therefore it is inappropriate to generalise about knowledge and awareness too much. Awareness of more specialist cancer services in Luton was worryingly low.

Some, but limited, number of Sikh women were aware of screening services such as smear tests and breast screening. Three people knew of the local hospice, but no one in the focus groups was aware of the term 'palliative care', or services, such as the Macmillan nursing care, that local palliative care provision included.

The Sikh women's focus group suggested that they would look for information concerning cancer in the newspaper and on television in English if the need arose. However, they expressed a need for leaflets to be produced in Punjabi as they felt these would be more accessible. There was also a desire to have more information provided about cancer on the Asian television channels. The potential of television and related visual media, in addition to newspapers and leaflets, to inform seemed to be more of a prevalent need for Sikhs while Bangladeshis preferred the use of community based networks³⁵.

³⁵ The meanings of cancer and perceptions of cancer services among South Asians in Luton, UK Institute for Health Services Research, Cancer Research UK (2004)

Chaplaincy Services in Hospital

Being in hospital presents a whole array of emotions for patients and their families, relatively simple appointments or operations can uncover complex issues. During this time, many people need time and space to turn to their faith for strength, comfort and guidance. Indeed the Human Rights Act (1998) and the Patients Charter places a legal responsibility on public bodies to ensure the rights on individuals to religious observance. However in a recent investigation³⁶ of a sample of 100 randomly selected NHS hospitals, in England and Wales, only five had a place of worship for Sikhs to utilise. This was the second lowest of the faith group investigated.

Trans-Atlantic research into Sikh health needs is by far more advanced than the UK; this is despite the UK being home to the largest number of Sikhs outside of Punjab. Canadian research³⁷ has outlined that nursing practices for Sikhs should consider the specific impact of spirituality, religious practice and health are entwined in an intricate balance for Sikhs and this should be integrated into any health care planning.

Given that religion plays a vital role in the everyday lives of many and is an additional criterion for the definition of ethnicity (RRA) it is important to factor in this lack of provision when considering how discrimination can be embedded into our public bodies without their knowledge.

An ethnic staff mix reflecting the local population would improve cultural competence and ensure that the right language skills and religious contexts are generic to services. Greater working relationships with local Gurdwaras could educate staff on the dietary, social, cultural and religious customs of a significant number of their patients.

Implementing proper ethnic monitoring of Sikhs, after adequate consultation with the community and training of staff, will improve relations with clients and customers and the delivery of services. Continued delays in implementation will result in scepticism among members of the Sikh community regarding the intentions of the health service towards their needs as well as acute undetected community needs being unintentionally ignored.

³⁶Hospital chaplaincy units show bias towards Christianity
<http://www.bmj.com/cgi/content/extract/327/7408/218?maxtoshow=&HITS=10&hits=10&RESULTFORMAT=&fulltext=sikhs+and+chaplaincy&searchid=1&FIRSTINDEX=0&sortspec=date&resourcetype=HWCI>

³⁷ Spirituality and Health in Punjabi Sikhs, Journal of Holistic Nursing Vol 25(2007)