

Better  
Housing  
Briefing

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**Monitoring the  
ethnicity of  
housing  
service users:  
forty years of  
progress?**

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## Key messages

- 1 Despite forty years of recommendations for ethnic monitoring in housing services, there is little evidence that such monitoring is actually taking place in a regular, systematic and detailed manner
- 2 A number of clear reasons why services should be monitored can be identified
- 3 Classifications used to record ethnicity should reflect the local picture, but it should still be possible to compare them to CORE and Census data
- 4 Although there is generally a lack of detailed analysis of the data collected, a number of housing associations and local authorities are producing reports that seek to go beyond merely presenting front-line lettings data.

## Introduction

Ethnic monitoring has been defined by the former Commission for Racial Equality (CRE) as the process an organisation uses to collect, store and analyse data about people's ethnic background (CRE, 2002). In its fullest definition it consists of four stages:

- a. developing a system of collecting, recording and maintaining information about racial and ethnic background;
- b. activating the system;
- c. analysing the data; and
- d. acting on the findings.

(CRE, 2006a)

Data collected can be used to highlight possible inequalities, investigate their underlying causes and remove any unfairness or disadvantage. In service delivery, monitoring can tell an organisation which groups are using its services and how satisfied they are with them. The organisation can then consider ways of reaching under-represented groups and ensuring that its services are both relevant to their needs and provided fairly.

This briefing paper focuses on ethnic monitoring and service delivery rather than on broader equalities issues (such as gender, disability, age, sexual orientation or religion) or employment. Many of the lessons learned from implementing and maintaining ethnic monitoring are, however, clearly applicable to the monitoring of these other dimensions of equality.

### 1 Forty years of recommendations

It is now forty years since the 1969 Cullingworth Report, *Council Housing Purposes, Procedures and Priorities*, recommended that '*[ethnic] records should be kept and used*' (Cullingworth, 1969). Six years later, the Government White Paper, *Race Relations and Housing*, stated that '*sensible and confidential [ethnic] record keeping should be encouraged in appropriate areas*' (HM Government, 1975). The push for the implementation of ethnic monitoring gained further strength following the publication in 1984 of the CRE's report *Race and Council Housing in Hackney* - a damning investigation of allocations procedures within the borough, in which the CRE highlighted the need for '*formal systems of ethnic record keeping*' (CRE, 1984, p. 81).

A quarter of a century has now passed since the Hackney report was published. That period has seen the CRE's *Code of Practice in Rented Housing* (both the [original code in 1991](#) and the [revised code in 2006](#)); the findings of the [Macpherson Inquiry](#) into the murder of Stephen Lawrence (published in 1999); the introduction of the CRE's Racial Equality Standard for Local Government (later subsumed by the Equality Standard for Local Government) and the Race Relations (Amendment) Act 2000, which amended the Race Relations Act 1976.

Despite the above, investigation of the current state of ethnic monitoring among housing providers (both local authorities and housing associations) ([Jones, 2007](#)) would appear to show that even those who were previously held to be beacons of excellence with regard to ethnic monitoring are (with a few notable exceptions) failing to produce regular, analytical reports. All collect ethnic origin data for housing applicants and/or those housed as a matter of course, but data collection is not the same as monitoring, it is merely one stage of the monitoring process.

What seems to be missing is the regular and systematic analysis of the data that has been collected, and its subsequent reporting. This could be due to conflicting or newly emerging priorities, changes in policies and key indicators, race equality being subsumed under a broader 'equalities' banner and/or a lack of adequate time and resources ([Jones, 2007](#)), but it is by no means a new phenomenon. Indeed, previous research has highlighted that *'equalities work in local authorities has traditionally been impaired by "faddism". Major events have led to flurries of activity, but the real concern is whether this activity is sustainable once the initial impetus dies away'* ([Bailey and Jones, 2001, p. 1](#)).

It should not, however, be assumed that this 'falling off' of ethnic monitoring is restricted to housing. A 2008 survey of the New Deal for Communities Programme ([Foden and Pearson, 2009](#)), for example, found that, although race was still the most frequently monitored equalities issue, in general fewer NDCs were monitoring equality and diversity impacts (other than in relation to age and sexual orientation) in 2008 than in 2006.

## Why monitor?

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If ethnic monitoring seems to have a lower profile than was previously the case, why should housing providers actually bother to carry it out? [Thornhill \(2009\)](#) notes a number of reasons, the persistence of racial discrimination and the need to eradicate it being a major one. However, apart from the 'carrot' of wanting to ensure that services provided are demonstrably fair, relevant and equitable, a number of 'sticks' can be identified (some local authority specific, others of wider applicability), including the following.

*The CRE Code of Practice on Racial Equality in Housing* states that *'Incorporating ethnicity into monitoring is an essential tool for achieving racial equality. Without this, it would be difficult to establish the nature or extent of inequalities, the areas where action is most needed, and whether the measures aimed at reducing inequality are succeeding'* ([CRE, 2006a, p. 66](#)). While the Code is not an authoritative statement of the law, it would be negligent not to meet its recommendations. This is because, as a statutory code, its recommendations are taken into account in cases brought under the Race Relations Act.

*The Race Relations (Amendment) Act 2000*. The CRE's *Ethnic Monitoring – A guide for public authorities* notes that although the general duty given to public authorities to promote race equality and race relations does not state that ethnic monitoring must be carried out, it does state that it will be *'difficult to show that you have met your duty to eliminate unlawful racial discrimination, and promote equal opportunities and good race relations if you do not have any monitoring data'* ([CRE, 2002, p. 6](#)).

*The Macpherson Report of the Stephen Lawrence Inquiry.* Guidance provided for local authorities by the Local Government Association, the Employers' Organisation and the Improvement and Development Agency (Hunt and Palmer, 1999) highlighted the need to review the effectiveness of race equality development on a regular basis. One of the key corporate race equality performance indicators identified was: 'are services monitored by ethnicity and evaluated annually to ensure that they are provided appropriately and accessed equally?' (Hunt and Palmer, 1999, p. 6).

*Equality framework for local government.* The need for effective monitoring underpins this framework. For example, under 'Responsive services and customer care - Developing: Understanding the importance of equality', local authorities need to develop 'systems to collect, analyse and measure data on how all sections of the community are able to access services', while under 'Achieving: Developing better outcomes' there is the requirement that 'access to and appropriateness of services is monitored regularly by portfolio holders and departmental management teams' (IDeA, 2009, p. 8).

*The National Indicators for Local Authorities and Local Authority Partnerships* (DCLG, 2008) require local authorities and their partners to have suitable mechanisms in place, including collection and monitoring of information, to enable them to deliver on the range of statutory equalities duties relating to race, gender and disability, to which they are subject.

*COntinuous REcording (CORE).* Any housing association with more than 250 units/bed spaces is required by the Tenant Services Authority to complete CORE logs (recording information on the characteristics of both housing association new social housing tenants and the homes they rent or buy) (TNS Research International, 2009). Social landlords that are not registered with the Tenant Services Authority but affiliated to the National Housing Federation are also invited to complete CORE logs. Local authorities were invited to participate in CORE from April 2004, with Communities and Local Government expecting that all stock-holding local authorities would be participating in CORE during April 2009. Although ethnic origin is requested for all lettings and sales, it comes with the rider that 'If you do not wish to answer this question, you can choose to refuse' (TNS Research International, 2009, p. D.1).

*Housing Inspectorate Key Lines of Enquiry (KLOEs).* In order to be rated as 'an organisation delivering an excellent service' with regard to diversity, a housing provider must prove that it 'knows, records, analyses and monitors information about the ethnicity, vulnerability and disability of service users and uses it to ensure services are delivered appropriately and to prioritise resources' (Audit Commission, 2007, p. 3).

### 3 What categories should be used?

The categories used for CORE are the same as those used in the 2001 Census, with the additional option of 'Gypsy/Romany/Irish Traveller' (which will be included in the 2011 Census). In fact, in its report *Common Ground* (CRE, 2006b), the CRE specifically recommended that local housing authorities add two separate categories for Gypsies and Irish Travellers in all ethnic monitoring arrangements, and take steps to encourage them to provide information about their ethnicity.

If the 2001 Censuses do not adequately cover the ethnic breakdown in a given area (e.g. if significant numbers of refugees and asylum seekers or economic migrants have moved into the area since the 2001 Census), housing providers may wish to disaggregate the Census/CORE codes to include these new groups as separate categories for their own use. For CORE purposes they could then be re-aggregated to fit in with the CORE categories (e.g. a separate Black-African Somali category could be re-aggregated into the Black or Black British-African category).

## Ethnic monitoring: good practice

As highlighted earlier, it would appear that, if anything, ethnic monitoring by local authorities has gone backwards over the past ten years. Data is collected, but with a few exceptions there is little, if any, evidence of it being used. What is particularly alarming is that the local authorities approached as part of a recent review of monitoring (Jones, 2007) were all held to be exemplars of good practice and included authorities that had achieved Level 5 of the former Equality Standard (for which the implementation of ethnic monitoring systems and the production of regular reports on that monitoring was essential). Despite all this, some evidence can be seen of some use being made of ethnic origin data, even if sometimes there is no great depth of analysis.

### *Good practice examples: housing associations*

As noted above, housing associations are required to record on a CORE log the ethnic origin of those they re-house. They then receive an annual return from CORE, which includes a breakdown of the ethnicity of those they have housed during the previous year - although this is based only on the aggregation of all of the individual housing association's CORE returns (i.e. it contains no comparative data, such as population breakdowns from the Census). Use made of this data would appear to vary between associations. Two examples of housing associations making at least some use of CORE data are the Guinness Partnership and Knightstone Housing Association.

**Guinness Partnership.** The Guinness Partnership produces an annual breakdown of lettings, including percentage of lettings to black and minority ethnic (BME) tenants by region, aimed at educating senior management and leading to knowledge-based decision making. This information is not, however, compared to the ethnic breakdown of the general population in those areas, because the partnership has approximately 50 000 properties located in some 180 local authority areas. The group was, however, able (using CORE returns) to prove that it does not discriminate unfairly on grounds of ethnicity in the type of properties it allocates (i.e. use was made of ethnic origin data beyond merely reporting the percentage of BME lettings).

**Knightstone Housing Association.** Knightstone produces an annual report for its board, covering the association's performance in relation to equality and diversity within two core housing services activities: lettings and racial harassment. The report compares lettings performance by ethnicity to the ethnic make-up of the areas in which the association operates, using lettings targets set in line with the population of south-west England as per the 2001 Census.

### *Good practice examples: local authorities*

Local authorities that have performed well in the recent past, in terms of not just collecting ethnic origin data, but actually analysing and presenting it, include Birmingham City Council, whose approach to monitoring is particularly praiseworthy.

**Birmingham City Council.** Birmingham has produced monitoring reports that try to explain the factors that may underlie differential housing outcomes with regard to the different ethnic groups in the city. In its most recently produced ethnic monitoring of housing report (August 2007), Birmingham City Council attempted to explain the 'front-line' performance figures by looking at a number of variables. Data for both council lettings and housing association nominations is compared to performance in previous years. The number of allocations (broken down by ethnic origin) is compared to the ethnic origin breakdown of the housing register and population data from the 2001 Census. The length of time spent on the waiting list prior to housing is also examined and related to choice of property type/quality and choice of area. Quality of lettings and refusal rates are also analysed.



Although Birmingham City Council would appear to have gone further than other housing providers in trying to explain the factors that underlie 'front-line' figures, it does, however, recognise that there is only so much that can be done in the form of a monitoring report, and that sometimes the function of monitoring is to identify areas that need to be the focus of more in-depth research.

**Wokingham District Council.** Despite having a smaller and less ethnically diverse population than Birmingham, Wokingham District Council has been proactive in the field of ethnic monitoring and housing. For example, it produces an annual ethnic monitoring report in which allocations made (by access channel) are compared with both Census data and the ethnic make-up of the housing register. The report does not contain detailed analysis, but at least presents performance data in a context that allows it to be compared with a baseline, rather than just reporting context-free figures.

**Northern Ireland Housing Executive.** Although the in-depth analysis contained in its *Draft Equality Impact Assessment* (NIHE, 2009) focuses primarily on religion, the good practice shown by the Northern Ireland Housing Executive is of much greater applicability. The impact assessment report looks at numbers on the housing waiting list in comparison to Census data; allocations made compared to Census data; and the relative time spent waiting for accommodation. Most notably, having examined the data to identify possible inequalities, the report then identifies a range of 'measures to mitigate adverse impact' (NIHE, 2009, p. 39). This is clearly taking monitoring to the next level: collecting data, comparing it to a baseline, identifying possible problems and suggesting potential solutions to those problems.

## Resources 1

### Housing-specific guidance

Commission for Racial Equality (1991) ***Accounting for Equality: A handbook for ethnic monitoring in housing***, London: Commission for Racial Equality. Although published eighteen years ago, and somewhat out-of-date with regard to ethnic classifications, much of the information contained in this handbook is still relevant for any organisation looking to set up, or to make better use of, ethnic monitoring systems and equalities monitoring systems more generally.

National Federation of Housing Associations (1985) ***Ethnic Record Keeping and Monitoring***, London: National Federation of Housing Associations.

### Housing Diversity Network

[www.housingdiversitynetwork.co.uk/?Page=Race#2031](http://www.housingdiversitynetwork.co.uk/?Page=Race#2031)

Housing Diversity Network has published a guide to monitoring ethnicity in housing. It was written by Jessica Smith of the Centre for Local Economic Strategies in July 2009.

### Guidance for a wider range of services

Commission for Racial Equality (2002) ***Ethnic Monitoring: A guide for public authorities***, London: Commission for Racial Equality, downloadable from: [www.equalityhumanrights.com/uploaded.../12\\_ethnic\\_monitoring.pdf](http://www.equalityhumanrights.com/uploaded.../12_ethnic_monitoring.pdf)

A good general guide to establishing monitoring systems, collecting and analysing data, setting targets and taking action.

Jones, A. (1996) ***Making Monitoring Work: A handbook for racial equality practitioners***, University of Warwick: Jones, Adrian.

Covers the 'whys' and 'hows' of monitoring, as well as examples of good practice, including examples from housing services.

Connelly, N. (1989) ***Ethnic Record Keeping and Monitoring in Service Delivery***, London: Policy Studies Institute.

An old, but still good, general guide to service delivery monitoring.

## Conclusion

Although ethnic record keeping of housing services has been recommended for forty years, it would appear that true monitoring (rather than mere record keeping) is in decline. At the most basic level, allocations data can be set in context by comparing it to data regarding the local population (typically the 2001 Census) and/or the ethnic origin of those on the waiting list for accommodation. All housing associations with more than 250 units/bed spaces and all participating local authorities receive an annual CORE General Needs New Lettings summary, which includes a breakdown of the number of allocations made by ethnicity. The basic information is therefore available; it just needs to be set in context.

Collecting data on ethnic origin is, broadly, no longer seen as 'a problem'. People have become used to providing such information. In data collection terms the key questions now are related more to issues of ethnic classification: what are the most relevant categories for any given area, how can they be updated to reflect the changing demography of an area and how can they best be used for comparison with data sources such as the Census?

Beyond classification the key issue now is how to 'get beyond' the front-line figures to actually identify, explain and (consequently) act on any potential areas of concern that may emerge. This is particularly important given the existence of time and resource constraints, the decline in the number of specialist staff, changing priorities and the emphasis on the broader equalities agenda. With regard to the latter, it should be stressed that just because service providers are expected to look at other facets of equality (age, gender, etc.), that does not mean that less priority should be given to race and ethnicity. The need for ethnic monitoring remains, albeit within a broader equalities/general management information framework. Indeed, it is crucial if multiple discrimination is to be identified and addressed. As it stands, there is a real danger that the baby may have been thrown out with the bath water.

## Resources 2

Office for National Statistics (2003) ***Ethnic Group Statistics: A guide for the collection and classification of ethnicity data***, downloadable from: [www.ons.gov.uk/aboutstatistics/measuringequality/ethnic-group-statistics/index.html](http://www.ons.gov.uk/aboutstatistics/measuringequality/ethnic-group-statistics/index.html)  
Guidance on how to collect and classify data on ethnicity.

### Other useful sources of information

Audit Commission (2004) ***The Journey to Race Equality: Delivering improved services to local communities***, London: Audit Commission, downloadable from: [www.auditcommission.gov.uk/nationalstudies/localgov/Pages/thejourneytoraceequality.aspx](http://www.auditcommission.gov.uk/nationalstudies/localgov/Pages/thejourneytoraceequality.aspx)

Commission for Racial Equality (2002) ***The Duty to Promote Race Equality: A guide for public authorities***, London: Commission for Racial Equality.

Commission for Racial Equality (2006) ***Code of Practice on Racial Equality in Housing***, London: Commission for Racial Equality, downloadable from: [http://equalityhumanrights.com/uploaded\\_files/code\\_of\\_practice\\_on\\_racial\\_equality\\_in\\_housing\\_england.pdf](http://equalityhumanrights.com/uploaded_files/code_of_practice_on_racial_equality_in_housing_england.pdf)

Northern Ireland Housing Executive (2009) ***Draft Equality Impact Assessment: Social housing development programme - Strategic guidelines***, Belfast: Northern Ireland Housing Executive, downloadable from: [www.nihe.gov.uk/draft\\_equality\\_impact\\_assessment\\_september\\_2008.pdf](http://www.nihe.gov.uk/draft_equality_impact_assessment_september_2008.pdf)

Tuke, A. (2008) ***Measuring Equality at a Local Level***, London: Improvement and Development Agency, downloadable from: [www.idea.gov.uk/idk/aio/8873228](http://www.idea.gov.uk/idk/aio/8873228)

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