

# Greater London Authority response to ‘Ethnic disparities and inequality in the UK: call for evidence’

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## Introduction

The devastating and unequal impact of the COVID-19 pandemic, and the outpouring of public anger in the wake of the killing of George Floyd, has brought a renewed focus on to the many longstanding inequalities experienced by minority ethnic people. The Mayor of London has been unequivocal in naming structural racism

as a key driver for these inequalities and has called for a new social contract that advances the twin causes of racial and economic equality<sup>1</sup>. In order to succeed, the Government's Commission for Ethnic Disparities should heed the wealth of evidence – including that collated by its Race Disparity Unit – of the structural inequalities that Black, Asian and minority ethnic (BAME<sup>2</sup>) communities experience.

The Greater London Authority's response to the Commission's call for evidence sets out answers to the specific questions posed. But it is important to emphasise the actions necessary to address the structural factors that drive these inequalities that the Government and other partners can take now.

These include:

- Reducing economic insecurity for those both in and out of work
- Actively promoting public and private sector workforces that better represent – at all levels – the communities they serve
- Implementing the recommendations of reviews on race equality already commissioned and received, such as the Lammy Review of Unequal Treatment in the Criminal Justice System, and the McGregor-Smith Review of Race in the Workplace
- Committing to continue to measure and improve data on a range of racial inequalities
- Ending the hostile immigration environment and no recourse to public funds policies

Although the remit of this review focuses on ethnic disparities, our response is focused on racial discrimination as 'race' is one of the protected characteristics outlined in the Equality Act (2010).<sup>3</sup> The negative impact on marginalised groups discussed in this submission does not arise solely out of ethnic difference, but the effects of racial discrimination and how these intersect with barriers related to a person's class, gender and a range of other characteristics.

## **1. What do you consider to be the main causes of racial and ethnic disparities in the UK, and why?**

Structural inequality, and within this structural racism, affects outcomes for a wide range of different ethnic groups – particularly those who are Black, Pakistani, Bangladeshi and Gypsy, Roma, Traveller groups - who are persistently disadvantaged in all major areas of life. This includes education, the labour market and income, housing, the environment, criminal justice, culture and health.

By structural inequality we refer to the inherent biases in social structures such as businesses, social networks and public institutions, which produce advantages for some groups at the expense of others. By structural racism we refer specially to how negative outcomes for BAME groups are perpetuated throughout society by these same unfair systems and institutional practices. BAME people may also be affected by other aspects of structural inequalities, impacting on them as a result of gender, sexual orientation, age, disability or socio-economic status, for example.

We see this in a range of different areas such as job applications, where all other things being equal in terms of skills and experience, a White person with an English sounding name is more likely to be invited to interview, offered a job and/or given a promotion than someone who is Black or has a non-English sounding name. Research conducted by the University of Oxford based on otherwise identical applications, showed how jobseekers from minority ethnic backgrounds had to send 60% more applications to receive the level of interest as those from the majority group<sup>4</sup>. Similarly in criminal justice, the Lammy report showed that Black defendants

are more likely to be given longer sentences for crimes like drug offences than White defendants, even when prior convictions were taken into account.[5](#)

The disproportionate impact of the Covid-19 pandemic also illustrates the way that structural racism manifests itself. Black, Pakistani and Bangladeshi communities were disproportionately exposed to the virus as a result of factors including:

- a greater likelihood of working in public-facing roles (in London, [50% of nurses](#) are from BAME backgrounds and [67% of the social care workforce](#)[6](#). The [IFS has found](#) a third of all working-age people from black African backgrounds are employed in key worker roles).
- living in overcrowded housing (BAME people are more likely to be affected by overcrowded living conditions, with Bangladeshi, Pakistani, Black African, Arab and Mixed White and Black African ethnic groups experiencing greater than average levels).[7](#)
- lower levels of financial resilience (BAME people are more likely to be unemployed and in precarious work than their white counterparts, according to a report by [UCL](#)[8](#) and represent a significant proportion of gig economy workers, who are likely to experience financial hardship as a result of COVID-19 measures).[9](#)
- increased exposure to air pollution (with BAME people more likely to live in more polluted areas)[10](#)
- racism in healthcare services (the PHE report ‘Beyond the Data’ highlights racism and discrimination experienced by communities and BAME key workers as a root cause affecting health, exposure risk and disease progression risk).[11](#)

While we know many of these negative experiences are shared with low income groups from a range of ethnicities, the fact that minority ethnic groups are disproportionately represented in the low income population (BAME groups make up 23% of the UK population in poverty, compared with 13% of the UK population overall ) means that structural racism is a driver in these factors. Had the White population been exposed to the same risk factors as the Black population, and experienced an equivalent mortality rate, the result would have been an extra 58,000 deaths[12](#).

Critics may argue that disparities between groups in themselves are not concrete evidence of discrimination. However, it is clear from the above evidence that structural inequality does exist and needs to be addressed in order to make long-term lasting progress to improve equality and fairness. Simply focussing on poverty as the reason for these outcomes, without a consideration of the role structural racism plays as an exacerbating factor, but also in determining which groups are more likely to experience poverty will not effectively reduce these disparities or break the cycle of BAME groups being more likely to be affected by socio-economic inequalities. Approaches which only seek to improve individual outcomes on a case-by-case basis or by supporting only the very ‘best and brightest’ of these groups, will also fail to address racial inequalities.

The Mayor has declared that the GLA is striving to be an anti-racist organisation, so that as an employer and throughout our work we actively seek to tackle structures that enable or reinforce racism and racist practices[13](#). He urges all Government Departments and agencies to examine the advantages in doing likewise and asks that the Commission consider how they can use their role to encourage this across central Government and other sectors.

## **2. What could be done to improve representation, retention and progression opportunities for people of different ethnic backgrounds in public sector workforces (for example, in education, healthcare or**

## policing)?

A lack of minority ethnic representation in public sector workforces – particularly at senior levels – is both a cause and a symptom of structural racism. Public sector workforces – and specifically leaders – that lack experience or understanding of the lives of minority ethnic groups will be less able to design and deliver services that meet the needs, and improve the lives, of the full diversity of the communities they serve. They are also less likely to have workplace cultures that support the progression to more senior levels of minority ethnic workers.

Examples where this is the case include education, where more action is also needed to diversify school leadership<sup>14</sup>, and in the Metropolitan Police Service (MPS) where the workforce remains disproportionately White. Efforts to improve representation at all levels in the workforce should attempt to address the barriers that prevent BAME people from entering and progressing in those sectors and should not start from a position of assuming that the problem is a lack of interest or suitable candidates.

The Mayor has launched programmes to support more teachers at middle and senior leadership levels<sup>15</sup> that include coaching and mentoring programmes to address the specific experiences of BAME teachers. And the steps to increase the diversity of the MPS workforce unveiled in the Mayor's Action Plan on transparency, accountability and trust in policing, go hand-in-hand with work to address other concerns about the way police powers affect Black communities<sup>16, 17</sup> Further improvements to the diversity of the police workforce could be made, and more rapidly, if Government were to review the legislative framework for police officer recruitment to ensure it supports efforts to maximise the number of new officer recruits from different backgrounds, and this has been called for in the recent Action Plan<sup>18</sup>.

A lack of minority ethnic representation in the workplace is by no means a challenge facing only the public sector. The Mayor is determined to support London's employers of all sectors to improve recruitment and progression opportunities. The GLA Group has led the way on ethnicity pay gap reporting<sup>19</sup> and the Mayor's Good Work Standard encourages businesses to publish their ethnicity pay gap data and demonstrate their commitment to preventing discrimination<sup>20</sup>. The Mayor has also recently published an employer toolkit which sets out how businesses can recruit, retain and support the progression of Black staff by addressing structural inequalities<sup>21</sup>. For its part, the Government must make good on its commitment to introduce and enforce mandatory reporting and put the reporting of ethnicity pay gaps on an equal footing with gender pay gaps.

### **3. How could the educational performance of school children across different ethnic and socio-economic status groups be improved?**

Poverty and socio-economic status are the biggest predictors of educational attainment. Structural racism means that minority ethnic children are disproportionately more likely to come from low-income households than their White counterparts and we know that the cumulative impact of public spending cuts since 2010 have fallen disproportionately on BAME groups.<sup>22</sup> This means that reducing the strain on pupils from low-income households is an important part of overall work to address ethnic disparities in education, and the Government should scrap policies which are limiting the incomes of families in need (such as the no recourse to public funds condition, the five-week wait for payment under Universal Credit, and policies like the benefit cap and the two child limit), as well as expand the eligibility criteria for Free School Meals and Healthy Start vouchers.

However, there are also a range of other structural factors that can both compound or operate separately to issues connected to poverty, and these also need to be tackled in order to close the attainment gap between Black and White children<sup>23</sup>. This includes disproportionate levels of school fixed-term and permanent exclusions and linked sanctions, such as isolations, that reduce educational attainment. Concerns have also been raised about the over-policing and criminalisation of Black children from their earliest years through the Safer Schools Officers scheme.<sup>24</sup> BAME children have been found to not be equally identified with Special Education Needs (SEN) – being over-represented for some types of SEN and under-represented for other types, compared to White British pupils, which can have a huge impact on support in education settings and overall educational attainment<sup>25</sup>. Direct racism in school impacts on BAME pupils, with a recent survey indicating that the vast majority of young Black people hear and witness racist language at school<sup>26</sup>. Discriminatory school policies have also been given recent attention, with work led by Black campaigners to change views of negative attitudes by school leaders, and society more widely, towards Afro-textured hair<sup>27</sup>.

The GLA-commissioned ‘Boys on Track’ research cites a range of studies which consider the impact of bias and expectation on ethnic disparities in attainment, including that teachers may have higher expectations of White and Asian students’ academic potential, that non-Black teachers can have lower expectations of Black students and that they are more likely to negatively judge (such as discipline or label) pupils from minority ethnic backgrounds.<sup>28</sup> These issues were particularly felt by male pupils of Black Caribbean ethnicity interviewed in the research. The research identified ways in which outcomes for Black Caribbean and white free school meal-eligible boys can be enhanced, including raising teachers’ expectations and addressing their biases, as well as recruiting and retaining a more diverse teaching workforce.

## **4. How should the school curriculum adapt in response to the ethnic diversity of the country?**

The Mayor has developed an innovative partnership with social enterprise The Black Curriculum aimed at enriching and diversifying elements of the London Curriculum<sup>29</sup>. This will provide young Londoners with a more complete perspective on the capital’s Black history and give teachers the resources required to facilitate this learning. The need to do this is indicative of the gaps in the National Curriculum more widely, with hundreds of thousands of people signing petitions<sup>30</sup> that call for a more inclusive curriculum in which history teaching better represents Britain’s colonial past, raises awareness of the mistreatment and histories of BAME people within Britain’s history and improves understanding of resultant racist legacies. With 73.1% of BAME pupils in London schools, it is also critical that the curriculum provides better and more positive representation of BAME groups.<sup>31</sup> Pupils from all backgrounds must feel represented in the materials from which they learn and feel a positive sense of identity and belonging through their education. This also will have an impact on BAME pupils’ engagement and success in education<sup>32</sup>. This will not happen without targeted work to change the current curriculum by the Government. We know for example that only a tiny proportion of characters in newly published children books are BAME, but work to draw attention to this has helped improve this representation slightly (from 1% of main characters in 2017 to 5% in 2019).<sup>33</sup> It is also why the Mayor has commissioned work on the capital’s visual public realm to ensure that its people and past are commemorated through statues, plaques and street names in a way that properly reflects the city’s diversity<sup>34</sup>. Representation and seeing oneself through history, literature and culture are all critical aspects of ensuring that everyday life is as inclusive as possible of the ethnic diversity of this country and younger generations of BAME Londoners should not be denied this.

## **5. How can the ways young people (in particular those aged 16 to 24 years) find out about and access education, training and employment opportunities be improved?**

Information failures are not the only – or indeed main - cause of inequalities in accessing the labour market. Structural inequalities such as employer discrimination in recruitment and workforce progression highlighted above contribute to a range of barriers that can mean young people from BAME groups are less likely to access education, training and employment opportunities. This all contributes to a significantly lower employment rate for BAME Londoners (67%) compared to White Londoners (79%).

Research from the Joseph Rowntree Foundation focusing on supporting minority ethnic young people from education into work also notes that increased educational attainment has not translated into improved labour market outcomes<sup>35</sup>. The research suggests councils are well placed to co-ordinate locally and offer a more accountable, targeted and sensitive approach. It identifies three key areas that could improve labour market outcomes for minority ethnic young people:

- Encouraging employers to recruit a more diverse workforce;
- Working with employers and young people to broker opportunities; and,
- Providing tailored support for ethnic minority young people.<sup>36</sup>

Access and widening participation initiatives from education or training providers, employers and other key actors should be carefully targeted and tailored to the specific needs of different minority ethnic groups; as well as also recognising the intersections between ethnicity and other characteristics such as gender and socio-economic status.<sup>37</sup> This is backed by recent research for the Department for Work & Pensions (DWP) which highlighted the importance of upskilling work coaches to go beyond generic support and provide tailored assistance, including in response to discrimination and racism in the labour market that DWP research has found clear evidence of.<sup>38</sup>

## **6. Which inequalities in health outcomes of people in different racial and ethnic groups are not (wholly) explained by inequalities in underlying determinants of health (for example, education, occupation or income)?**

Inequalities in health outcomes are to a large extent – but not entirely – explained by inequalities in underlying determinants of health caused by structural factors. Professor Sir Michael Marmot refers to these as "causes of the causes – the social determinants of health."<sup>39</sup> His explanation of socially determined health outcomes goes beyond what we typically understand to be the causes of ill health (such as smoking, drinking, poor diet and exercise).

These inequalities in the underlying determinants are experienced particularly by some BAME communities. For example, experiences of racial discrimination have been linked to numerous mental and physical health

outcomes.<sup>40</sup> These processes do not operate in isolation but co-occur and sequentially lead to deepening inequalities in many domains across a person's life course and are transmitted from one generation to the next.<sup>41</sup> Taken together, extreme examples of these inequalities include the devastating impacts we saw with Covid-19, or the shockingly different health outcomes, including life expectancy, for Gypsy, Roma and Traveller Groups<sup>42</sup>

Rather than searching for some other causal explanation, there should be a concerted focus on addressing the structural inequalities in educational attainment, occupational segregation, low-income, access to services etc and an understanding of the negative consequences of these in shaping BAME people's lives. These are currently under-investigated aspects and a barrier to change.

Other indicators of wellbeing that are also lower in minority ethnic groups, and are linked to discrimination includes social isolation and loneliness. The Survey of Londoner's reported that social isolation is more common among Black Londoners (38 per cent) and Londoners who do not speak English well (39 per cent) and those on the lowest income (18 per cent) had higher rates of loneliness<sup>43</sup>. These are patterns which we expect have become more pronounced with the impact of the pandemic.

## **7. How could inequalities in the health outcomes of people in different ethnic groups be addressed by government, public bodies, the private sector, and communities?**

Racial inequalities in health outcomes cannot be addressed by just focussing on the health sector. Addressing the impacts of poor housing, poverty, access to green space and occupational segregation must all be part of the solution. In terms of health care services, BAME people and migrants are more likely to experience barriers to accessing healthcare services including the impact of language barriers, immigration policy and trust issues (resulting from having poorer experiences and outcomes of past treatment).<sup>44</sup> Different approaches are required to tackle these issues effectively.

The Mayor's work with Doctors of the World UK, to translate COVID-19 guidance into over 60 languages, including videos, audio and translations as part of the 'Keep London Safe' campaign is an example of effective public health communications overcoming language barriers and reaching over 1.1million Londoners.<sup>45</sup> Work to co-produce service models and ensuring that service transformations tackle health inequalities explicitly is also an effective approach. To assist with this the Mayor has defined six tests<sup>46</sup> to assess the impact of proposed health care transformations or reconfigurations on health inequalities to ensure that, where possible, actions are taken to narrow the inequalities gap.

The Mayor has also repeatedly drawn attention to the impact of the hostile immigration environment on health outcomes. 2017 legislation expanded the NHS Visitor and Migrant Cost Recovery Programme, obligating NHS Trusts to charge some migrants upfront for NHS treatment at 150% of the tariff, and withhold care not deemed urgent or immediately necessary for those unable to pay upfront. The regulations also increased the range of services included in the charging regulations, affecting services such as termination of pregnancy, some drug and alcohol services, and some district nursing services and obliged NHS trusts to record a patient's chargeable status on their NHS record.<sup>47</sup> Patients with outstanding NHS debts greater than £500 are reported to the Home Office after two months, and this debt affects the success of future immigration applications.

There is a wealth of evidence showing that NHS charges and the presence of immigration status and healthcare entitlement checks in NHS hospitals deters migrant and asylum-seeking patients from accessing services.<sup>48</sup> Many migrants face further systematic exclusion from Primary Care if they are unable to prove their address or provide photo identification following the misapplication of NHS patient registration guidance. Further, the introduction of questions seeking to clarify immigration status on GP registration forms deters migrant patients from accessing care and encourages wrongful refusal of registration. This policy can also lead to BAME British people, particularly those from migrant backgrounds, facing discrimination and being more likely to be asked to evidence their entitlement to care if they are not white. The Government's own equality analysis of the NHS charging regulations states: "non-white people or people for whom English is not their first language are, on some occasions, targeted in the application of the 2011 regulations due to speculation or assumption that they are not resident in the UK."<sup>49</sup>

Suspending NHS patient charges and ending all data-sharing between NHS trusts, the Department for Health and Social Care (DHSC) or NHS Digital and the Home Office for immigration decision making or enforcement would support a reduction in the health inequalities exacerbated by these policies, accompanied by an information campaign to assure the public - including all migrants and NHS staff - that NHS care will be free and safe for everyone.

In relation to the pandemic, the Government must respond to the World Health Organization's call across the world to ensure that everyone, including all migrants and refugees, has equal access to health services and is effectively included in national responses to COVID-19.

In terms of barriers to mental health, BAME groups have been found to delay seeking help and are both over-represented in acute mental health services yet overlooked for talking therapies. The Mayor is supporting work to develop new models of service provision appropriate to the needs to diverse communities. These include co-produced care and support using local relationships and expertise to tackle institutional barriers<sup>50</sup>. Work to address inequalities in Londoner's mental health and wellbeing is also a core pillar in London's Recovery Programme.<sup>51</sup>

## **8. What could be done to enhance community relations and perceptions of the police?**

We know from the MOPAC Public Attitude Survey (FY 2019/20<sup>52</sup>) that across many measures, certain groups of Londoners hold less positive views of the police – for example, Black and Mixed-Race Londoners are 13 and 14 percentage points less likely than the average for all Londoners to say that the police treat everyone fairly. Concerns about Black communities' experiences of police use of force, such as being 4 times more likely to be stopped and searched in public than White Londoners have intensified in 2020. In response the Mayor has developed an Action Plan to increase transparency, accountability and trust of Black communities in policing. MOPAC will work with the MPS and communities to deliver the Plan. This joint approach will help to ensure that actions taken as part of the plan have the confidence of Londoners, in particular Black Londoners, in addressing the disproportionate impact of police powers. The Plan has four key themes:

- Better use of police powers – addressing historical harms and disproportionately negative impacts on Black people; work to prevent this from happening in the future and ensuring the use of police powers are fair and proportionate.

- Working together to make Black communities safer – opportunities for Black communities to engage on police strategies and service delivery and work to improve relationships with Black children and young people.
- A police service that better represents and understands Black communities – work to both increase recruits and progression for BAME officers with a specific focus on Black officers; improving community input into police training.
- Holding the police to account for what they do – involving and supporting communities in the scrutiny of local policing and strengthening community oversight of police custody, making data accessible and supporting Londoners to know their rights.

These actions speak directly to urgent concerns raised with the Mayor about fairness and the impact of structural racism across all public institutions including policing. While they in themselves should have a positive impact on community relations and perceptions of the police, we urge the Commission to follow the Mayor’s approach and take bolder action to address structural racism across all institutions. Action on this issue needs to go much further than just ‘perceptions’ of policing and respond to what data and evidence is showing us.

It is also important that we see leadership from police forces themselves to improve trust and confidence. The Commissioner of the MPS for example has stated that the MPS is “not free of discrimination, racism or bias” and that they have a “zero tolerance of racism” and will try to eliminate any such racism and discrimination, however it appears<sup>53</sup>.

## **9. What do you consider to be the main causes of the disparities in crime between people in different racial and ethnic groups, and why?**

The causes for disproportionality in relation to crime are complex and some lie outside the wider Criminal Justice System (CJS), rooted in systemic inequalities and poverty. Numerous reports have shown that across CJS systems and institutions BAME people are more likely to have more negative outcomes<sup>54</sup>. For example, the average custodial sentences are 27 and 26 months for Asian and Black offenders compared with 18 months for White offenders. Proper Government action in responding to the recommendations in these reports would help reduce these disparities.

As an example of the complexities in the causes of crime, in the most deprived areas in London, residents are more likely to be from minority ethnic backgrounds and crime affects these areas more. In 2018, the top 10% most vulnerable wards recorded over three times the number of knife crime offences on average compared to the 10% least vulnerable<sup>55</sup>. This will have an impact on the numbers of minority ethnic people who are victims or offenders of knife crime. Moreover, analysis undertaken by the GLA into serious youth violence in London indicated that there are correlations between serious youth violence and child poverty and the indices of deprivation<sup>56</sup>. This points to a cumulative impact of structural inequalities – such as deprivation, racism, lack of space or opportunities and school exclusions – which can lead to exposure to crime.

In relation to the disproportionality seen in police figures the Mayor has been clear that how police powers are used must be clearly justifiable and reasonable. Racial profiling, discrimination or bias must not be a factor in how decisions in policing are made, but we know that this has sometimes been the case. This is why the Mayor has developed an Action Plan on transparency and accountability in policing – and our expectation is that the Plan will lead to a decrease in the disproportionate use of police powers. The Government must ensure that other aspects of the Criminal Justice System also actively work to ensure that their systems are free from bias and

discrimination. Implementing the recommendations from previous reports on race equality will be a positive step forward in this regard.

## **10. Can you suggest other ways in which racial and ethnic disparities in the UK could be addressed? In particular, is there evidence of where specific initiatives or interventions have resulted in positive outcomes? Are there any measures which have been coun**

Policy to address ethnic disparities must have a strong targeted approach to structural racism – which has an impact on the outcomes and opportunities at almost every stage of BAME people’s lives – from maternity, early years and schooling through to entry into and progression in the labour market and experiences in later life. The impact of structural racism is longstanding and deep-seated. While it will not be overcome overnight, it is possible to make progress with sufficient commitment and resources.

**These solutions include:**

### **Reducing low pay and improve economic security for both those in and out of work.**

- 45% of Pakistani and Bangladeshi and over 1/3 of Black employees in London earn below the London Living Wage compared with 18% of White employees. More attention should be given to good quality employment, as well as employment rates and pay gaps.
- Low pay among workers is an increasing social and economic problem that underlies much disparity – both negative outcomes related directly to income such as poverty and poor or insecure housing, but also as a driver of indirect outcomes such lower educational attainment, and poorer health and life expectancy.

Public services and businesses becoming more representative of the communities they serve, especially at a senior level.

- There is a lack of senior representation and ethnicity pay gaps throughout many public and private employment structures. As with longstanding work to improve gender representation, research has shown this increased diversity is a key driver of innovation and economic performance.[57](#)
- To address workplace inequalities, employers need to remove bias in systems and processes across a range of areas, including[58](#): challenging negative perceptions of underrepresented groups; easing the transition from education to employment for young people; and, better monitoring and evaluation.
- Businesses should explore the provision of English for Speakers of Other Languages (ESOL) learning opportunities for workers during paid hours. The Mayor has also engaged with employers on how businesses can provide employment opportunities for refugees, support them to progress in the workplace, and to advocate for policy changes that better enables social integration.
- The Mayor's Good Work Standard provides any employer or organisation with a set of best employment practices alongside information and resources. These are organised into four key areas which will help tackle structural racism: fair pay and conditions, workplace wellbeing, skills and progression, diversity and recruitment[59](#).

### **Build community trust and engagement through implementing recommendations and taking action.**

- This call for evidence comes on top of previous very thorough reviews with high quality recommendations. Examples include the Lammy Review of unequal treatment in the Criminal Justice System and the McGregor-Smith Review of race in the workplace. There have been a number of reviews referenced earlier in relation to Covid-19, all of which have clear recommendations. Communities tell us they do not need more reviews - they want to see action on those to which they have already contributed.

### **The old adage ‘what gets measured, gets done’ still has resonance.**

- The Government should make firm commitment to measuring and publishing progress on reducing ethnic inequality gaps between groups and commit to an action plan. This measurement needs to extend to the private sector – companies need to take responsibility for understanding and measuring their own ethnicity pay gaps and representation.

### **Improve the quality and granularity of data on ethnicity**

- In the first wave of Covid-19 many people lost their lives as the lack of data on ethnicity prevented Government from understanding and taking action to tackle the disproportionate impact of Covid-19 deaths among BAME ethnic groups. Even in the second wave, we still cannot effectively monitor the disproportionate impact on cases as the data on ethnicity are missing for too high a proportion of cases. There are no official estimates of life expectancy by ethnicity, as this is not recorded on death registrations – recording this is something the Mayor encouraged well before the Government announcement on it this autumn.
- Measuring regional inequalities (for instance household income and ethnicity) often requires combining several years of survey microdata. This makes it too slow to measure progress within a period such as an electoral term.
- Weaknesses in data on ethnicity to measure progress effectively are an example of structural racism. The Mayor took action to overcome this with our Survey of Londoners in 2018/19 which reported a wide range of outcomes for a range of ethnic, religious and national groups but a review is needed by Government statistics producers to identify and address weaknesses in the system.

### **Two examples of policy programmes which have been counterproductive are the hostile immigration environment and no recourse to public funds (NRPF).**

- The Government’s hostile environment policies, legally introduced through the 2014 and 2016 Immigration Acts, are clearly discriminatory. Wendy Williams’ ‘Lessons Learned Review’ highlighted how campaigners have argued that policies such as ‘right to rent’, whereby rented accommodation can be refused to migrants without leave to remain, contribute towards racial discrimination. Her report also highlights that the Home Office evaluation of the policy also recognised the potential for racial discrimination.<sup>60</sup> Williams also remarked on the poor monitoring of the racial impact of immigration policy and decision making in the Home Office.<sup>57</sup>
- In 2019, the UN Special Rapporteur on racism urged the British government to scrap hostile environment policies due to their connection with racial discrimination.<sup>62</sup>
- NRPF has been shown to contribute towards destitution and discrimination. Research has found that nearly all families in London that access support due to struggling with NRPF and destitution are Black and minority ethnic.<sup>63</sup> The suspension of NRPF as people are continuing to experience the effects of the pandemic will enable many who are facing hardship to access the support they require and remove the perverse incentive not to self-isolate, when this is required. The Home Office must conduct a full review into the discriminatory impact of the NRPF condition, as proposed following recent litigation.<sup>64</sup>

## References

- [1](https://twitter.com/mayoroflondon/status/1321095959204536321) See <https://twitter.com/mayoroflondon/status/1321095959204536321> and <https://www.theguardian.com/commentisfree/2020/apr/19/bame-dying-coronavirus-sadiq-khan>
- [2](#) A note on our use of the term ‘BAME’ (Black, Asian and minority ethnic). While there is legitimate criticism of this term to describe the ethnic background of an individual, it is important analytically as a collective term to understand the overall disparity between White and non-White ethnic groups for different outcomes (e.g. the GLA’s analysis of London’s ethnicity pay gaps shows that all BAME ethnic groups have lower pay than the White group, with an average pay gap of 28%, but that this ranges from a pay gap of 8% to 37% for different groups). This is the purpose for which the term ‘BAME’ was originally designed (not to describe individual identity). It remains important in 2020, when data on individual groups are limited. Where available, disaggregated terms are used and these are preferable when it comes to understanding the specific ways in which certain groups experience society.
- [3](https://www.legislation.gov.uk/ukpga/2010/15/section/4) <https://www.legislation.gov.uk/ukpga/2010/15/section/4>
- [4](http://csi.nuff.ox.ac.uk/wp-content/uploads/2019/01/Are-employers-in-Britain-discriminating-against-ethnic-minorities_final.pdf) Centre for Social Integration, Nuffield College, Oxford [http://csi.nuff.ox.ac.uk/wp-content/uploads/2019/01/Are-employers-in-Britain-discriminating-against-ethnic-minorities\\_final.pdf](http://csi.nuff.ox.ac.uk/wp-content/uploads/2019/01/Are-employers-in-Britain-discriminating-against-ethnic-minorities_final.pdf)
- [5](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/643001/lammy-review-final-report.pdf) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/643001/lammy-review-final-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/643001/lammy-review-final-report.pdf)
- [6](https://www.theguardian.com/society/2019/jul/24/windrush-nursing-top-jobs-programme-bme-nurses) <https://www.theguardian.com/society/2019/jul/24/windrush-nursing-top-jobs-programme-bme-nurses>; <https://www.skillsforcare.org.uk/adult-social-care-workforce-data/Workforce-intelligence/documents/State-of-the-adult-social-care-sector/State-of-Report-2019.pdf>; <https://www.ifs.org.uk/inequality/chapter/are-some-ethnic-groups-more-vulnerable-to-covid-19-than-others/>
- [7](https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowded-households/latest) <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowded-households/latest>
- [8](https://www.ucl.ac.uk/news/2020/mar/bame-millennials-greater-risk-being-unstable-employment) <https://www.ucl.ac.uk/news/2020/mar/bame-millennials-greater-risk-being-unstable-employment>
- [9](https://www.equalityhumanrights.com/sites/default/files/briefing-letter-to-government-covid-19-coronavirus-19-march-2020.pdf) <https://www.equalityhumanrights.com/sites/default/files/briefing-letter-to-government-covid-19-coronavirus-19-march-2020.pdf>
- [10](https://www.ons.gov.uk/economy/environmentalaccounts/articles/doesexposuretoairpollutionincreasetheriskofdyingfromthecoronaviruscovid19/2020-08-13) <https://www.ons.gov.uk/economy/environmentalaccounts/articles/doesexposuretoairpollutionincreasetheriskofdyingfromthecoronaviruscovid19/2020-08-13>
- [11](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892376/COVID-19-inequalities-report.pdf) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/892376/COVID-19-inequalities-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892376/COVID-19-inequalities-report.pdf)
- [12](https://www.ippr.org/blog/ethnic-inequalities-in-covid-19-are-playing-out-again-how-can-we-stop-them) <https://www.ippr.org/blog/ethnic-inequalities-in-covid-19-are-playing-out-again-how-can-we-stop-them>
- [13](#) /press-releases/mayoral/mayor-declares-city-hall-an-anti-racist-body
- [14](#) In London, there is a considerable gap between the proportion of BAME teachers compared to the pupil population. Research from 2017 showed that in inner London the proportion of BAME teachers was 26% while the proportion of BAME pupils was 81% (in outer London the figures were 22% and 65% respectively).
- [15](#) /programmes-strategies/education-and-youth/teach-london/improving-diversity-londons-teacher-workforce
- [16](#) /press-releases/mayoral/stop-and-search-to-be-better-scrutinised
- [17](#) During consultations on the Action Plan we heard from police officers and communities who told us that without these changes also happening, retention rates of officers from minority ethnic groups would not improve.
- [18](#) Specifically, Section 159 (4)(b) of the Equality Act does not allow the MPS to prefer Black officers who meet the standard for recruitment or promotion. This provision specifically prevents an employer

from having ‘a policy of treating persons who share the protected characteristic more favourably in connection with recruitment or promotion than persons who do not share it.’ A temporary lifting of this clause could help provide a more representative MPS.

- [19](#) Since 2017 we have narrowed our ethnicity pay gap from 16% to 11.06% and publishing robust action plans to tackle these pay gaps. Since 2016 representation of BAME staff in the GLA has also increased to highest ever levels at 30%.
- [20](#) /programmes-strategies/business-and-economy/supporting-business/what-mayors-good-work-standard
- [21](#) /what-we-do/workforce-integration-network-win/inclusive-employers-toolkit/about-toolkit
- [22](#) Cumulative Impact Assessment of Welfare Reform in London, <https://data.london.gov.uk/dataset/welfare-reform-2019/>
- [23](#) Black London children have an average Attainment 8 score of 45.6 compared with 48.8 for White London children
- [24](#) As raised in the consultation on the Mayor’s Action Plan on policing and in ‘Race and Racism in English Secondary Schools’ report (Runnymede 2020)
- [25](#) <https://www.ox.ac.uk/news/2019-02-13-ethnic-minority-children-not-equally-identified-special-education-needs>
- [26](#) <https://www.ymca.org.uk/press-statements/young-discriminated-and-black>
- [27](#) <https://www.worldafroday.com/education>
- [28](#) /sites/default/files/lkmco\_boys\_on\_track\_report.pdf (page 12)
- [29](#) /press-releases/mayoral/mayor-calls-for-a-more-diverse-national-curriculum
- [30](#) For example: <https://petition.parliament.uk/petitions/324092>
- [31](#) From <https://www.gov.uk/government/statistics/schools-pupils-and-their-characteristics-january-2020>. This figure includes the following White ethnic groups: Gypsy, Roma Traveller groups and ‘any other White background’. If considering ethnicities other than White the percentage of BAME pupils drops to 58.1%.
- [32](#) For example: <https://www.tes.com/news/disheartened-bame-pupils-are-dropping-out-gcses>
- [33](#) <https://clpe.org.uk/publications-and-bookpacks/reflecting-realities>
- [34](#) /press-releases/mayoral/mayor-unveils-commission-to-review-diversity
- [35](#) This is also highlighted in The Runnymede Trust Briefing: <https://www.runnymedetrust.org/uploads/Runnymede%20Reframing%20Racism%20TUC%20briefing.pdf>. This shows that shows that effectively all minority ethnic groups are impacted by inequalities in the labour market to differing extents across the measures they use. Black African groups tends to have the worst outcomes in relation to being for their job if a graduate, but for other measures (e.g. pay below living wage) Bangladeshi groups were most affected.
- [36](#) Morris, M. (2015) Supporting ethnic minority young people from education into work. Joseph Rowntree foundation. <https://www.jrf.org.uk/report/supporting-ethnic-minority-young-people-education-work>
- [37](#) Social Mobility Commission (2016) Ethnicity, Gender and Social Mobility. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/579988/Ethnicity](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/579988/Ethnicity)
- [38](#) DWP (2019) Interventions supporting Ethnic Minority labour market participation: Part one. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/773018/interventions-supporting-ethnic-minority-labour-market-participation-part-one.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/773018/interventions-supporting-ethnic-minority-labour-market-participation-part-one.pdf)
- [39](#) <http://www.instituteofhealthequity.org/resources-reports/marmot-review-10-years-on>
- [40](#) Nazroo 2003, Wallace et al. 2016, Williams et al. 2019
- [41](#) Gee et al. 2012, Bécares et al. 2015
- [42](#) The health status of Gypsies and Travellers is much poorer than that of the general population: with life expectancy is 10 to 12 years less than that of the non-Traveller population; 42 per cent of English Gypsies are affected by a long term condition (opposed to 18 per cent of the general population) and one in five Gypsy Traveller mothers will experience the loss of a child (compared to one in a hundred in the non-

Traveller community). From:

<https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/360.pdf>

- [43](https://data.london.gov.uk/dataset/survey-of-londoners-headline-findings) <https://data.london.gov.uk/dataset/survey-of-londoners-headline-findings>. This is compared to social isolation in White Londoners (20%) and those that speak English as their first language (29%). In terms of loneliness this compares with people on higher incomes: £37-58kpa (8%) and for higher than £58kpa (3%).
- [44](https://wellcome.org/reports/wellcome-monitor-2020-covid-19-study) [44 https://wellcome.org/reports/wellcome-monitor-2020-covid-19-study](https://wellcome.org/reports/wellcome-monitor-2020-covid-19-study) - The Wellcome Trust Monitor 2020 COVID-19 Study found that already disadvantaged groups were least likely to trust government and institutional sources, with BAME groups and those struggling financially least likely to trust sources in the health sector or government.
- [45](/coronavirus/covid-19-resources-and-services-your-language) </coronavirus/covid-19-resources-and-services-your-language>
- [46](/programmes-strategies/health-and-wellbeing/champion-and-challenge/mayors-six-tests) </programmes-strategies/health-and-wellbeing/champion-and-challenge/mayors-six-tests>
- [47](#) The National Health Service (Charges to Overseas Visitors) (Amendment) Regulations 2017. Available from: [http:// www.legislation.gov.uk/uksi/2017/756/contents/made](http://www.legislation.gov.uk/uksi/2017/756/contents/made)
- [48](#) Doctors of the World UK (2017). Deterrence, delay and distress: the impact of charging in NHS hospitals on migrants in vulnerable circumstances. Accessed 02/10/18 from <https://www.doctorsoftheworld.org.uk/publications> Maternity Action (2018). What Price Safe Motherhood? Charging for NHS Maternity Care in England and its Impact on Migrant Women. Accessed 02/10/18 from <https://www.maternityaction.org.uk/policy/publications/what-pricesafe-motherhood-charging-for-nhs-maternity-care-in-england-and-its-impact-on-migrant-women/> 10
- [49](#) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/735353/equality-analysis-charges-ovs-visitors-acc.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/735353/equality-analysis-charges-ovs-visitors-acc.pdf)
- [50](https://synergicollaborativecentre.co.uk/navigating-the-fault-lines-for-co-produced-change-in-south-west-london/) <https://synergicollaborativecentre.co.uk/navigating-the-fault-lines-for-co-produced-change-in-south-west-london/>
- [51](/coronavirus/londons-recovery-coronavirus-crisis/recovery-context/mental-health-and-wellbeing) </coronavirus/londons-recovery-coronavirus-crisis/recovery-context/mental-health-and-wellbeing>
- [52](https://data.london.gov.uk/dataset/public-perception-) <https://data.london.gov.uk/dataset/public-perception->
- [53](https://www.met.police.uk/notices/met/commissioner-statement-working-with-londons-communities-build-further-trust-confidence-police/) <https://www.met.police.uk/notices/met/commissioner-statement-working-with-londons-communities-build-further-trust-confidence-police/>
- [54](#) For example, reviews that have previously considered community-police relations and the impact of policing on different communities, include the Lammy Review, the Angiolini Review, the London Rape Review, and the Report on the Stephen Lawrence Inquiry. When considered together they have produced hundreds of recommendations that should have been implemented urgently to address these deep-rooted issues. The Government failed to do so, which is why as well as launching the Action Plan, the Mayor wrote to the Prime Minister to highlight this failure and to urge the Government to play their role in increasing trust and confidence in the police.
- [55](#) London Vulnerable Localities Profile - </programmes-strategies/mayors-office-policing-and-crime/data-and-statistics/london-landscape>
- [56](https://bit.ly/36Kp2vq) <https://bit.ly/36Kp2vq> - A Public Health Approach to Serious Youth Violence: Supporting Evidence July 2019 GLA Strategic Crime Analysis Team, City Intelligence Unit
- [57](https://www.weforum.org/agenda/2019/04/business-case-for-diversity-in-the-workplace/) <https://www.weforum.org/agenda/2019/04/business-case-for-diversity-in-the-workplace/>
- [57](#) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/874022/6.5577\\_p.113](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874022/6.5577_p.113).
- [58](#) GLA 2020, 'Voices of the Underrepresented', </what-we-do/workforce-integration-network-win/voices-underrepresented>
- [59](/programmes-strategies/business-and-economy/supporting-business/what-mayors-good-work-standard#:~:text=The%20Mayor's%20Good%20Work%20Standard%20brings%20together%20best%20employ) </programmes-strategies/business-and-economy/supporting-business/what-mayors-good-work-standard#:~:text=The%20Mayor's%20Good%20Work%20Standard%20brings%20together%20best%20employ>

- [60](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874022/6.5577_p.109)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/874022/6.5577\\_p.109](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874022/6.5577_p.109)
- [62](https://www.ein.org.uk/news/un-special-rapporteur-racism-says-uk-must-urgently-abandon-hostile-environment-immigration) <https://www.ein.org.uk/news/un-special-rapporteur-racism-says-uk-must-urgently-abandon-hostile-environment-immigration>
- [63](https://static1.squarespace.com/static/590060b0893fc01f949b1c8a/t/5d0bb6100099f70001faad9c/1561048725178+the+cost+of+the+No+Recourse+to+Public+Funds+policy.+The+Unity+Project.+June+2019.pdf)  
<https://static1.squarespace.com/static/590060b0893fc01f949b1c8a/t/5d0bb6100099f70001faad9c/1561048725178+the+cost+of+the+No+Recourse+to+Public+Funds+policy.+The+Unity+Project.+June+2019.pdf>
- [64](https://dpglaw.co.uk/home-office-agrees-a-rethink-of-no-recourse-to-public-funds-policy-in-light-of-coronavirus-following-todays-high-court-legal-challenge/) <https://dpglaw.co.uk/home-office-agrees-a-rethink-of-no-recourse-to-public-funds-policy-in-light-of-coronavirus-following-todays-high-court-legal-challenge/>