

11 June 2020

Ms Siobhan Carey
Chief Executive and Registrar General
NISRA
Colby House
Stranmillis Court
BELFAST
BT9 5RR

Dear Siobhan

I trust you and your colleagues are keeping safe and well in these extraordinary times in which we are all working. I appreciate you have been very busy/occupied with the production of data-relating to COVID-19 over the recent period and that this work is vital to understand the pandemic and help shape the public policy responses to it.

We valued the opportunity to work with you recently in producing the joint signposting guide on Section 75: Using Evidence in Policy Making.

I write now to highlight the importance of equality-disaggregated data in relation to the tracking and analyses of COVID-19 impacts currently and in the future and to seek information on NISRA's plans to ensure collection of such data.

You will know that the Commission has long recommended that public authorities collect equality disaggregated data to inform Government public policy making and service delivery, to ensure effective implementation of the equality duties established by the Northern Ireland Act 1998 which oblige public authorities to pay due regard to the need to promote equality of opportunity across nine equality groups. We have consistently asked public authorities to collect equality disaggregated data so that equality considerations are at the heart of public policy decision making. In recent years, we have highlighted the importance of equality disaggregated data to underpin the draft Programme for Government measures.

COVID-19 has reinforced the critical importance of equality disaggregated data. Whilst we welcome that some Department of Health COVID-19 dashboard data routinely includes breakdowns of impacts by the grounds of age and gender, data on other grounds, for example, on disability or race is not included.

Regarding other areas of public policy or service delivery, we are not aware of equality considerations being highlighted in any published Northern Ireland specific COVID-19 datasets or analyses. This contrasts sharply with the position in Britain, and it would appear from data there and from elsewhere that there are differential equality impacts of the virus on a range of equality grounds.

Indeed, it would appear that the virus is reinforcing existing health and wider inequalities and the concern is that existing inequalities will be exacerbated, or new inequalities will emerge.

Given the potential equality impacts, we are concerned to ensure that disaggregated Northern Ireland specific equality data is being collected, analysed and used to inform decision making in relation to COVID-19. We have been reminding relevant Departments and public authorities of the vital importance of paying due regard to the need to promote equality of opportunity in decision making. In general, we recommend that all key measures should be tracked not only in aggregate, but also for the impact on individuals from each of the Section 75 groups.

Departments and public authorities should in general ensure that where they are collecting data they are doing so across the full range of equality grounds so that the design, delivery and review of any changes to law, policy or service provision is improved by access to comprehensive analysis.

In short, adequate equality data is critical in shaping the public policy response going forward. I would welcome information on any NI specific COVID-19 data or analyses being produced; and on any plans NISRA has to ensure that all key COVID-19 metrics will be disaggregated and analysed by equality ground and to address the apparent gaps in relation to equality disaggregated data that have seemingly further crystallised in recent months.

I look forward to your response and would be happy to discuss if this would be helpful.

Yours sincerely

Personal Data

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