

**TOOLKIT FOR EQUALITY**  
CITY POLICIES AGAINST RACISM

# Equality Data Collection

1st Edition September 2024



# Toolkit for Equality City Policies against Racism

## Equality Data

### The city gets active in its function as a

- **democratic institution**
- **rule-maker**
- **employer**
- **service provider**
- contractor

### ECCAR 10 Points Plan of Action

- 1 Greater Vigilance against Racism**
- 2 Assessing Racism and Discrimination and Monitoring Municipal Policies**
- 3 Better Support for the Victims of Racism and Discrimination
- 4 More Participation and Better-Informed City Dwellers
- 5 The City as an Active Supporter of Equal Opportunity Practices
- 6 The City as an Equal Opportunities Employer and Service Provider
- 7 Fair Access to Housing
- 8 Challenging Racism and Discrimination Through Education
- 9 Promoting Cultural Diversity
- 10 Hate Crimes and Conflict Management

## 1st Edition

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# Introduction

The Toolkit for Equality is a manual to support cities in implementing local policies that successfully counteract racism and racial discrimination or to support cities in improving existing ones. The Toolkit provides experience-based step-by-step instructions for implementing concrete policies, starting with the conceptualization and ending with measuring their impact. All content is based on expertise shared by experienced city officials, civil society actors and target group representatives working in European cities.

Our aim has been to give concrete suggestions and share valuable insights on best practices of other ECCAR member cities. We invite you to read the toolkit as the joint expertise of colleagues in other cities and to pick up the ideas that could benefit the work in your city. The realisation of this Toolkit would not have been possible without the support of cities and city employees, who contributed their experiences, knowledge and time. ECCAR and the editors thank all participating cities for their contributions, in particular<sup>1</sup>:

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Botkyrka (Sweden)

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**Nantes (France)**

Pecs (Hungary)

Potsdam (Germany)

Rotterdam (Netherlands)

Santa Cruz (Spain)

Sevilla (Spain)

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Valencia (Spain)

**Vienna (Austria)**

**Zurich (Switzerland)**

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# EQUALITY DATA COLLECTION

The term “Equality data” may be given different meanings in different contexts, with the understanding of “quantitative data and statistics” usually coming to mind first. Large datasets that are disaggregated into discrimination categories such as gender, age, race / ethnicity, country of birth / citizenship, religion, and belief, to name just a few, usually come to mind too. This data is rarely available at the national level (in terms of being collected in a routine, standardised manner), and certainly not at the local level. International organisations – and local authorities too – are therefore increasingly encouraging its collection. This toolkit chapter aims to provide practical guidance on data collection for small and medium-sized cities first and foremost, based on practical experience gathered from cities as well as the knowledge acquired by the ETC over the years. Both qualitative and quantitative data is considered in this context, along with the different collection scopes and the range of purposes for which the data is used. This chapter also takes into account the different situations and starting points for local authorities, which include:

- No equality data is collected
- Certain equality data is collected (e.g. victim reports, complaints data or statistics on the make-up of staff at city administrations)
- The city has access to several resources such as administrative statistics or NGO data but lacks the knowledge and capacities to evaluate this data.

This chapter bases its understanding of the term “equality data” on the following definition laid down in the *European handbook on data collection*:

**Data** refers to information in various forms, numerical or otherwise. Its fundamental purpose is to provide insights into aspects of reality, enabling analysis, reasoning, and decision-making. When data pertains to an identified or identifiable individual, it is classified as **personal data**, while the individual in question is referred to as the data subject. Sensitive data encompasses personal data relating to matters such as racial or ethnic origin, religion or belief, disability, or sexual orientation. Any operation involving personal data, including collection, recording, usage, dissemination, and destruction, falls under the term “processing”, in accordance with the terminology established by EU data protection law.

The concept of **equality data** encompasses information that proves valuable for describing and analysing the equality situation. This information may assume either a quantitative or qualitative nature. In some instances, data collected primarily for non-equality purposes can be repurposed to generate equality data.

**Equality groups** is an inclusive term for bodies and collectives that advocate for equality, as well as those that have experienced discrimination or inequality based on attributes such as racial or ethnic origin, religion or belief, age, disability, sexual orientation, or gender identity.



**Context**

The following chapter was developed based on the practical application experiences of the following cities (in alphabetic order): Barcelona (Spain), Cologne (Germany), Ghent (Belgium), Graz (Austria), Heidelberg (Germany), Leuven (Belgium), Nantes (France), Vienna (Austria), Zurich (Switzerland).

Information was gathered using desk research and interviews with city representatives involved in data collection as part of a local authority. Members of the ECCAR Scientific Advisory Council also supported development of this chapter. Last but not least, the successful approaches used by ETC Graz to collect relevant equality data at the local level were incorporated too.

# WHY IS IT NECESSARY

How do local authorities benefit from the collection and evaluation of equality data? The specific benefits gained usually depend on the scope of data collection as well as the method used. In the following, common general benefits are summarised into different categories, in accordance with a variety of data collection mechanisms. These categories will provide support and inspiration for local authorities in a negotiation context.

**KNOW YOUR COMMUNITY:**

- Knowledge about the prevalence and type of racial discrimination and inequality in the city (also unreported discrimination and inequality),
- Knowledge about the number and characteristics of the beneficiaries of public services,
- Awareness of diversity in the local population, their views, concerns and needs,
- Access to information on the local population (number and characteristics) that makes administration / service provision easier.

**MAKE DECISIONS AND POLICIES EVIDENCE-BASED:**

- Evidence for monitoring discrimination and diversity (depending on the approach) and identifying trends,
- Evidence for developing and refining action plans and their target groups,
- Knowledge of structural inequality and intersectional discrimination: the realities of structural inequality and racism cannot be identified and demonstrated without equality data collection and research.
- Substance and evidence for rationalising and justifying political decisions (to achieve a concrete result),
- Decision-making: define policy priorities among different political problems (and to justify the prioritisation),
- Assessment and evaluation of how objectives have been achieved (follow-up),
- Evidence for budget planning,
- Evidence for the development of social and infrastructural programmes for under-represented communities,

- Assessment of trends relating to racism and discrimination and the impact of municipal policies.

#### **SERVE YOUR COMMUNITY:**

- Identification of barriers to accessing public services,
- Tailoring of public services to the needs of the local population and increasing of effectiveness/accessibility,
- Evidence and information to facilitate reporting of discrimination,
- Equality data collection could reveal discrimination, but it could also reveal that racialised people are rarely discriminated against,
- Equality data can protect local authorities (e.g. the police) against accusations of discriminatory acts / racial profiling (if the evidence does not support the accusations),
- Facilitation of reporting and tailoring of victim support services.

#### **STRENGTHEN PARTICIPATION AND COLLABORATION WITH CIVIL SOCIETY:**

- Increasing of access to collaboration and to the expertise of NGOs and academia,
- The collection of equality data motivates local communities to report discrimination.
- Moreover, it sends a clear sign to communities and to the general population that the city acknowledges discrimination, wants to hear their experiences and is willing to enter into dialogue, helping to strengthen trust between city authorities and communities.
- The collection of equality data increases transparency, which in turn fosters trust. Problems are recognised and publicly addressed rather than being sugar-coated. Equality data collection is therefore also a means of increasing public participation.

Additional convincing arguments for data collection and monitoring are described in the chapter on *Monitoring*.

Some local authorities are hesitant to collect equality data, because they are concerned about drawing attention to racist tendencies in their city, thereby tarnishing its image. However, any local authority that seeks to monitor discrimination and identify systemic barriers will gain credibility as being accountable for protecting and promoting human rights. Its efforts to identify, record and monitor discrimination at the local level shows that it represents the entire community. In this way, collecting equality data and gathering evidence on racial discrimination increases trust in democracy and can help raise a city's profile.

The ECCAR cities that contributed to this chapter are lead cities with experience in the benefits of collecting equality data. They are the living proof of the positive effects of addressing discrimination in an open and evidence-based way, with the collection of equality data having boosted, rather than hurt, their image. People affected by discrimination are likely to feel safer in an environment where racism is addressed by data collection.

#### **WHAT YOU NEED (INGREDIENTS):**

- Political will (decision by city council),
- And in this context: Commitment from all administrative departments (implemented top-down) to support the process by supplying data and information,
- Institutional capacity to collect and access data.

**WHAT IS HELPFUL BUT NOT ABSOLUTELY NECESSARY?**

- Equality data collection is incorporated into an action plan (as it is a commitment in the ECCAR 10 Points Plan of Action),
- Presence of a university or research centre in the city,
- Presence of a victim support service or equality body (to provide case data),
- Civil society organisations,
- Well-organised migrant or racialised communities.

## Limitations

Equality data collection is a solid basis for developing strategies (action plans) or actions to prevent and combat racial discrimination and foster equal access to public goods and services. Nevertheless, equality data collection does have some limitations that are addressed in this section in order to manage expectations. They are not intended to discourage local authorities from collecting such data.

Equality data (particularly when related to race, ethnicity or nationality) is biased by several factors that will be addressed in this chapter. There are several limitations in terms of budget, lack of capacities or knowledge or legal restrictions on the collection of equality data at the local level.

The collection of large sets of disaggregated data is challenging (if not impossible) for small and medium-sized cities. This chapter therefore suggests alternative methods that these cities with a modest budget can use to collect reliable data.

In terms of indicator-based monitoring of discrimination and racism, there is no one-size-fits-all approach. There is also no widely available indicator system in place that local authorities throughout the globe can access and use. Racism is a complex and multi layered problem that cannot be encapsulated in one value (such as drop-out rates in schools). Data collection and evaluation is a more context-specific endeavour and these guidelines are designed to support local authorities in this context.

This chapter contains practical tips that will empower and motivate cities to address and overcome these limitations and collect equality data, based on the experiences of leading cities and scientific experts.

# FOUNDATION

## Planning and engaging stakeholders

Planning equality data collection is a multi-layered task. The following steps are not designed to be sequential. Guidance is geared primarily towards local authorities, which link in at the early stages of data collection. However, the steps are also relevant for cities that already have access to data collection mechanisms or collect data on their own initiative.

Cities that are at the early stages of collecting equality data often have to start by raising awareness and conducting negotiations. The following sections support this process of planning and engaging stakeholders.

### **1<sup>st</sup> Step: Refer to the political commitment in your city**

Through its ECCAR membership, your city has expressed its commitment to equality data collection and monitoring racism. All ECCAR member cities undertake to collect equality data, as they have signed the *10 Points Plan of Action*. Commitment 2 – Assessing Racism and Discrimination and Monitoring Municipal Policies – invites cities “*To initiate or develop further the collection of data on racism and discrimination, establish achievable objectives and set common indicators in order to assess the impact of municipal policies.*” More concretely, cities enter into an obligation

- To set up a formal means of collecting data and information on racism and discrimination in all fields of municipal competence by introducing relevant variables in their data collection,
- To establish partnerships with research entities in order to regularly analyse the data and information collected, conduct studies at local level and develop concrete recommendations for the city authorities,
- To define achievable objectives and apply common indicators in order to assess trends in racism and discrimination and the impact of municipal policies.

Equality data collection is also recommended at European Union level, such as by the *EU Anti-racism Action Plan 2020-2025* or by the European Commission Subgroup on Equality Data, which provides *Guidelines on how to improve and use equality data*. Last but not least, the European Union Agency for Fundamental Rights has published a *Compendium of practices* for equality data collection on different discrimination grounds and areas of life in which discrimination, inequality and exclusion can occur. The compendium is linked to the aforementioned Guidelines. Cities are advised to consult these documents to encourage data collection in their own field of action at the political and at the operative level.

Many cities also have diversity or equality strategies and action plans in place. Requests for data collection mechanisms can be argued for based on these documents, which outline political priorities as well as the agenda. This will boost the legitimacy and acceptance of the

data collection mechanism within the city. Structural anchoring of a regular mechanism to collect and evaluate equality data will enhance sustainability.

Even if the sphere of competence of local authorities to act against discrimination is limited in countries with a federal system of government, cities still have a moral responsibility to counteract discrimination.

The experience of ECCAR cities shows that some support is initially required at the political level to carry out data collection practices (even if they are small-scale). Ideally, the deputy mayor / city councillor – who is responsible for content – supports the initiative. However, a city may initiate the gathering of evidence of discrimination in agreement with the direct political advisor. High-level political support – i.e. a top-down approach – are needed however, if the routine collection of equality data is to be mainstreamed structurally, particularly in cases where data is also collected from the local authorities themselves.

**Milestone:** agreement on setting up an equality data collection working group

## 2<sup>nd</sup> Step: Set up a working group on equality data collection

As a first operative step, the establishment of a working group comprising members at the administrative level who are responsible for the relevant topics is recommended. The aim here is to provide evidence for the need to collect data in the city and to map any existing data that is relevant to assessing equality. It is therefore advisable for the working group to routinely consult with the representatives of racialised people at civil society organisations. Moreover, it is advisable for the group to engage in bilateral conversations with important actors at the political level in order to lobby for the need for evidence to ensure informed decision making at the local level when it comes to equality.

The working group is responsible for coordinating the implementation of data collection within the city as well as for ensuring relevance and progress.

## 3<sup>rd</sup> Step: Map, assess and compile existing equality-related data as well as the actors involved in data collection

Many local authorities collect (administrative) data that is related to equality. This data is often disparate, fragmented and very specific in scope, however. Nevertheless, it can be made relevant and used to populate equality indicators.

As a first step, we recommend recompiling and specifically evaluating existing data to meet (some of) the information required. Censuses are carried out in almost all countries; many regions and (larger) cities have data on their employees and service users; equality bodies, victim support services and other NGOs are other providers of equality data.

All of these data sources are to be mapped and assessed by the working group regarding their usefulness in indicating the current situation and trends relating to diversity and equality.

To sum up: A mapping and baseline assessment of existing data and actors/institutions helps to:

- Obtain an overview on existing resources and information (stakeholders),
- Establish a systematic approach to data collection, which avoids duplication of data collection efforts,
- Formulate, refine or populate indicators,
- Make existing capacities and resources visible and accessible,
- Identify severe information gaps.

We recommend that the working group carry out (or initiate) systematic and structured mapping of existing (data) resources. Ideally, the mapping should be structured along the lines of the data source, data characteristics, sample and population, reference, time frame and scope in relation to equality and the provider. Such a mapping involves taking stock of the current status of equality data and can also be easily updated.

The experience of ECCAR member cities shows that mapping existing data in this way can also be done by low or semi-skilled workers that are trained for this purpose. Mapping therefore does not absorb a lot of resources.

The mapping report can be used to conduct a baseline assessment of capacities and challenges that local authorities face in the field of equality. This baseline assessment allows major data gaps to be identified, along with the evidence needed. The working group can then propose or initiate small-scale (low-budget) initiatives, to fill any gaps. Examples for such initiatives include questions on racism in surveys and reports that have been conducted in a city, such as security and quality of life surveys or social equality and youth reports. When addressing data gaps in designing brief, small-scale data collection mechanisms, prioritise any data gaps that are more important for your equality objectives (in terms of content) and require less resources.

#### RISKS, CHALLENGES

It is difficult to convince key actors about the need to collect data

#### MITIGATION MEASURES

Refer to the arguments above and to the political priorities (action plan);  
 In addition, try to allay the concerns of key actors, which frequently relate to the resource situation: they may fear additional work with no increase in funding;  
 Compare it to initial reluctance to assess gender inequality due to a lack of awareness and progress achieved in this regard;  
 Refer also to the need for evidence-based policy-making and the monitoring objectives that were initially set at the political level;  
 This chapter outlines different methods for achieving meaningful results with limited resources.



There are several data gaps (e.g. due to the under-reporting of discrimination, a lack of victim support services in small cities to record cases, low awareness of which data could be used to analyse inequality).

Make these gaps visible as resources for future data collection in the city; maintain/create resources for equality data collection to fill data gaps; Where a cooperation arrangement with a university is in place and gaps are small and relatively easy to fill, offer co-supervised diploma theses or dissertations.

Existing equality data is of limited significance (due to legal amendments, changes in data collection methods, the availability of data or new societal challenges that have not yet been considered in existing data)

Take this data into account anyway but make the limited significance and the changes clear. Such data provides:

- a reference point for the situation before the legal or societal changes. This data is needed to demonstrate possible effects.
- an indicator of how inequality is affected by the societal and legal context. This in turn can show the opportunities and spheres of influence of local politics.

Local authorities do not want to know about the prevalence of discrimination in the city as this knowledge would “force” them to act.

- Equality data can also show actors that there is actually a very low rate of discrimination or that concerns exist only for a very specific group of people.
- Addressing inequality and implementing anti-discrimination measures do not necessarily need to consume a lot of resources. The city is sure to benefit, as will its administration’s reputation.
- Consider not publishing the findings initially (but instead use them internally first).

#### MILESTONES:

- A decision on setting up a working group on data collection is made,
- A working group is established and has developed its first annual working plan,
- A mapping report has been written.

# Developing the concept

In this section, account is taken of the fact that – because equality data collection is a multi-pronged task, there is no one-size-fits-all concept. For example, a city could make a few initial decisions and choose to take action on one priority issue (such as education or housing) and start by developing a concept on that data collection mechanism. It could also decide to access existing data collection mechanisms and include questions on racism in surveys and reports that are conducted in the city, such as security and quality of life surveys or social equality and youth reports. Political priorities also shape the data collection concept itself.

This section on *Developing the concept* therefore includes different approaches and scopes of data collection mechanisms in the framework of three scenarios, depending on the local authorities' level of awareness and the availability of data.

Research for this chapter clearly shows that the data collection concept is strongly shaped by the local authorities' awareness of and willingness to see the realities of inequality and racial discrimination. As already outlined, the fact that the number of complaints to equality bodies is low does not necessarily indicate that discrimination is infrequent or non-existent, and vice versa. An awareness among local authorities that discrimination does exist, even if evidence for it is not (yet) available, is a core precondition for the protection of equality data. A lack of awareness among local authorities regarding inequality and racial discrimination is usually connected to a corresponding lack of knowledge about this field. However, even where local authorities are aware of inequality and discrimination (e.g. from the national level, international studies or legal knowledge), they may still lack knowledge of this phenomenon in their own local context. These factors – level of awareness and of knowledge about inequality and discrimination – are crucial factors that shape the development of a data collection concept.

Nonetheless, there are some features that all equality data collection mechanisms at the local level should include. These are outlined in steps 4 (scope and frequency of data collection) and 5 (principles of equality data collection). The subsequent step (step 6) for developing a concept goes on to outline the different scenarios.

## **4<sup>th</sup> Step: Decide on the scope and frequency of data collection**

The concept for the data collection mechanism is to be developed with reference to the city's political priorities (content, scope), the purpose of data collection (methods, frequency) and the existing data (mapping). It is recommended to include the preconditions for data use and disclosure in the concept. Moreover, the informed consent procedure (i.e., how to inform the individuals about the public disclosure of data and the reasons for and usage of data collection) is to be determined in the concept.

Agree on the core objectives of your data collection mechanism and the methods you will use and discuss them with the main actors involved, including racialised people, representative organisations and the affected population. In addition to your content-specific information needs, consider the following:



**PURPOSE/FREQUENCY:**

1. Do I want to monitor and identify developments over time?
2. Do I need evidence for policies / action plans / negotiations?
3. Do I want to address a specific challenge / topic / information need with this data?
4. Do I need an impact assessment of existing actions?

**METHOD OF DATA COLLECTION AND EVALUATION:**

- a. Am I interested in quantitative information (frequencies, prevalence, correlations)?
- b. Am I interested in qualitative information (views, experiences, life situations, arguments, procedures)?

**HOW TO DISTRIBUTE THE WORKLOAD:**

- I. Can the data be gathered within the city, e.g. the statistical department?
- II. What role can NGOs and equality bodies play and what contribution can their usual reporting obligations make?
- III. What kind of support is needed from external actors, e.g. universities and consultants?

**Tip!**

In your concept, provide information on how collecting and using equality data will assist in eliminating discrimination and achieving equal opportunities and inclusion. This will help alleviate the concerns of racialised persons about being asked to self-identify. Privacy of individuals must be assured and data collection, storage, access and disclosure must be carefully controlled.

## **5<sup>th</sup> Step: Make sure that the principles of equality data collection are applied**

The Equality Data Initiative is a cooperative project of the Open Society Foundations, the Migration Policy Group and the European Networks Against Racism. It has dedicated itself to ensuring standards and initiating equality data collection. Six principles of equality data collection were developed within the framework of this initiative.

**These include**

1. Allow respondents to self-identify (rather than using third-party attribution),
2. Ensure that participation is voluntary,
3. Obtain consent after informing participants about the purpose of the data collection,
4. Ensure anonymity in data collection (i.e. that the data is collected anonymously or processed in such a way that it is no longer possible to trace who gave what answer),

5. Ensure the participation of racialised groups and communities during the whole data collection process (i.e., they should be consulted about naming categories and developing questions that concern, for example, identifying impairment or attributed "ethnic" ancestry; they must also consent to the purposes of data collection),
6. Ensure that multiple and intersectional identities are possible (i.e., respondents have the option to tick more than one identity category if they wish).

## 6<sup>th</sup> Step: Base your concept on the level of awareness and knowledge in the city, using three scenarios as a starting point

The following information is structured along the three scenarios, as introduced in the beginning of this section on concepts of equality data collection at the local level.

The three scenarios target (1) awareness among local authorities of equality/discrimination (low/high) and (2) the data situation in the city (rich/poor). Research for this chapter shows that these two factors play a crucial role in shaping the data collection concept, thereby forming the core preconditions for selecting a suitable approach to equality data collection. This chapter does not discuss the extent to which these two factors are connected, but we will look at appropriate approaches to equality data collection. These approaches are field tested and applied successfully by local authorities (in ECCAR member cities). The selection of approaches is based on two criteria:

1. Good practices, applied successfully by local authorities,
2. Relevance for local authorities according to their needs.

ECCAR member cities have outlined their needs for building equality data collection capacities in the [ECCAR Reporting Tool](#). The applied practices used by cities, which correspond to these needs, were researched in depth. The following overview of these practices is structured along the following lines:

- What kind of data collection mechanism is it and how does it work?
- When to apply,
- What is needed (preconditions and resources),
- Step-by-step instructions for implementation,
- Limitations (pros and cons),
- Impact.

### SCENARIO 1: LOW LEVEL OF DATA AND LOW LEVEL OF AWARENESS OF DISCRIMINATION AMONG LOCAL AUTHORITIES

Scenario 1 describes a very basic situation where no equality (or relevant) data is available to local authorities, e.g. because the authority does not have any data collection institutions. Consequently, their awareness of the existence of discrimination and of the need to gather evidence of inequality/discrimination is low. As argued throughout this chapter, equality data provides evidence of existing (in-)equality. It can also be used as an argument for further data collection mechanisms, which in turn would, however, require an awareness among local authorities that

is not there. Cities that cannot draw on existing data and whose local authorities have a low level of awareness of discrimination can probably categorise themselves in scenario 1.

It is therefore the task of the equality data working group (see step 2) to constantly lobby and raise awareness of data collection – using the mapping report (step 3) and the findings of brief small-scale surveys or NGO data. Making experiences of people affected by discrimination visible, conducting testing and small-scale community surveys set the stage for larger city-wide commitments.

### Tip!

If your city does not yet have a large-scale commitment to collecting equality data, start with a simple community online survey or as a first step, commission NGOs to collect and report experiences and stories from their clients and make them visible. This evidence will help you set the stage for building commitment among local authorities (in addition to referring to the political arguments outlined above).

Evidence is available as soon as the experiences of people who are affected by (but did not report) discrimination are made visible by small-scale studies and stories. Consequently, local authorities (ideally) start to consider a low number of complaints as a reporting barrier rather than a low level of discrimination. The number of reports (complaints) to victim support services or equality bodies is sometimes used as an indicator for the prevalence of (racial) discrimination. The significance of this indicator is severely limited. The number of complaints tends to be connected to other factors and circumstances, such as awareness of discrimination, a knowledge of where to turn in case of discrimination, the availability of low threshold complaint mechanisms, the availability of an anonymous complaints (counselling) service and – last but not least – the level of trust in the authorities that making a complaint will be worthwhile. Given these considerations, a high number of complaints tends to indicate that a complaint mechanism is working well and that there is a high level of awareness and trust. Conversely, a small number of complaints does not necessarily indicate a low level of discrimination.

### **APPLIED PRACTICE: SURVEY ON REPORTING BARRIERS (REASONS FOR UNDER-REPORTING AND HOW TO FACILITATE REPORTING OF DISCRIMINATION)**

Victim support services and counselling centres gather complaints data. However, this data only comprises information on racial discrimination incidents that are reported. Under reporting of racial discrimination is prevalent throughout Europe (see sources below). This means that local authorities do not see the full picture if they only consult such data.

Against this background, we recommend that local authorities set up (or commission) a survey on unreported discrimination among the local population to identify the magnitude and forms of perceived discrimination as well as reporting barriers. The survey should include the core features of the perceived discrimination, reasons for under-reporting and factors that would facilitate reporting.

Previous research at EU level indicates the following reasons for under-reporting discrimination. These findings can be used when designing the survey:

**1. AWARENESS OF DISCRIMINATION AND ANTI-DISCRIMINATION LEGISLATION:**

- Victims and bystanders (witnesses) are not sure how to recognise discrimination (they do not know that what they see/feel is discrimination),
- Lack of awareness and knowledge of existing reporting mechanisms and complaint services.

**2. MEANINGFULNESS OF REPORTING DISCRIMINATION:**

- Victims do not make use of reporting – they do not understand how they would benefit from reporting discrimination.

**3. CONSEQUENCES OF REPORTING:**

- (Fear of) intimidation, stigmatisation and other forms of secondary victimisation.

A survey on reporting barriers helps to estimate the actual prevalence of discrimination (including areas, personal characteristics of victims, relations to perpetrators) and it provides evidence for reporting barriers (including the reasons for under-reporting and suggested ways to facilitate reporting). This type of equality data collection therefore has the potential to create a “safer space” for affected (marginalised) people to openly express their experiences and views. Data collection enables local authorities to:

- Identify discrimination that is not reported (including characteristics of victim and offender, area and coping strategies),
- Identify reasons for the reluctance to report discrimination,
- Identify groups that are particularly reluctant to report discrimination and why,
- Identify needs and means to support the reporting of discrimination,
- Enhance public trust in local governments (discrimination is taken seriously and reporting is encouraged).

**Apply if you need to**

- Develop and implement measures that facilitate reporting of discrimination,
- Raise awareness of the channels and procedures for reporting racial discrimination and the benefits thereof,
- Assess the prevalence of racial discrimination (beyond complaints data),
- Reduce unrecorded cases of racial discrimination,
- Develop or tailor victim support services in line with the needs of marginalised people,
- Develop awareness-raising campaigns against secondary victimisation, structural discrimination, stigmatisation and intimidation where incidents are reported,
- Develop training for local authorities and officials to identify victims of discrimination and deal with them in an adequate way,
- Establish or tailor the services of anti-discrimination offices in line with the needs of those who are hesitant to report,
- Establish networks with civil society and its organisations to facilitate reporting.

## What you need: preconditions

- Political backing: a (deputy) mayor, who is keen to facilitate reporting,
- Resources of a part-time researcher employed for six months; internal staff resources for briefing the researchers and monitoring the implementation of research; material costs for PR (small or medium-sized city),
- Timescale of around six months (from the call for proposals to the availability of findings for a small or medium-sized city),
- An assessment of decision-making competence at local level in the area of discrimination. If these competences are severely limited, argue for local engagement, referring to the local level's moral responsibility (as enshrined in the equality principles of the municipal code or in the constitution),
- A local university or research institute is not a precondition for collecting this kind of data, but a benefit. A local research institute is networked in the city and has knowledge of the city structure and the NGO landscape. Where no local university is available or working relations are not good, a local authority can work just as well with research institutions in other cities.

## Tip!

When assessing the reporting barriers, take into consideration the scope of the mandate of reporting points (victim support and counselling services) too. Barriers include acceptance barriers, not just accessibility. A reporting point may be easy to access (low-threshold), but will not be widely used if it only deals with the legal aspects of discrimination and offers no social support.

### Risks/challenges for negotiating within the local authority

Complex governance structure, responsibilities for discrimination are split, political actors at several levels and civil society organisations (CSOs) all only deal with a specific type of discrimination. The specifics of local government responsibilities are often defined by national or regional laws and regulations. Local governments' legal responsibility for addressing racial discrimination can therefore vary significantly, depending on the country and its legal framework. Multi-level governance (MLG) in a federalist system and split responsibilities of CSOs and equality bodies hinder standardised documentation of reports. Moreover, a coordinated approach to dealing with racial discrimination is becoming more difficult. These factors may pose a challenge for local authorities seeking to conduct a survey on reporting barriers (and how to address them) at the local level.

### Mitigation measures

Develop voluntary engagement on discrimination as a political priority and “moral duty”. Conduct policy-based research (mapping) to figure out how to implement this engagement (commitment) at the local level.

Set-up a clearing point and referral mechanisms.

Data evaluation may compensate for the irregular and heterogenous documentation of cases. Consider setting standards for documenting reported cases.

### Risks/challenges for collaborating with research institutes

The scope of research (field) is becoming broader, more global and increasingly theoretical. This poses a challenge particularly for local authorities cooperating with researchers.

Researchers or those involved in data collection do not fully understand how local government works. They treat a local authority as a private company or non-governmental organisation (NGO).

### Mitigation measures

Clearly define the scope (subject) of your research interest and stick to it. Meet regularly with the researchers to ensure that the actual scope still meets your expectations/needs.

Over the course of cooperation, brief researchers on how exactly the local authority works (in relation to the area at stake). Conduct meetings to discuss the scope of research (at the start of cooperation at the very least).

The output of research (your product) is a conceptual note or in-depth analysis. Its practical usefulness is questioned by local authorities.

Do not expect to produce an output that you can use immediately. Translate the research findings into evidence for your daily work (= coordinated or implemented by the equality data steering group).



#### Risks/challenges for implementing the research findings (and facilitating reporting)

#### Mitigation measures

Lack of awareness of discrimination and complaint procedures.

Cooperate with local media and anti-discrimination offices.

During holiday season in the summer, print media are more flexible and often look for stories that they would not otherwise run. Use this time to raise awareness of racial discrimination and reporting through local media channels.

Provide information on discrimination and complaint procedures in simple language. As a general rule of thumb, avoid language that is too bureaucratic.



Marginalised groups are difficult for local authorities and anti-discrimination professionals to approach.

Training for public representatives on how to avoid secondary victimisation; involvement of community leaders and members of CSOs and representative organisations.

Make use of role models (journalists, citizens, activists and NGOs), as they can play a significant role (as motivators and multipliers) in reporting incidents.



Lack of trust in the authorities among the local population.

Establishment of cultural mediators in public services, creation of an environment of trust for victims;

Diversity in local authorities reflecting diversity in the population;

Anonymous counselling phone line before considering reporting or introduction of confidential (online) reporting mechanisms.



## Tip!

At the start of research, invest time in briefing researchers on the local authority's responsibility for dealing with racial discrimination. This will ensure that the research runs smoothly, that you get the information you need and that the findings at the local level are useful. An in-depth briefing prevents the analysis of research trajectories to tackle racial discrimination from being too time-consuming and beyond the sphere of local level action.

## Impact

*On knowledge and awareness:*

- Increased trust in local authorities among the local population leads to higher discrimination reporting rates,
- Discrimination cases that are not legally relevant can also be assessed and dealt with.

A side effect of the data collection process: During the data collection process, representatives of minority / marginalised groups are consulted about reporting barriers and informed of reporting opportunities. These actors can then pass on this information, becoming multipliers in their communities and the data collection process could lead to a higher discrimination reporting rate.

*Factors that facilitate reporting: findings from a survey<sup>2</sup> on reporting barriers:*

- Establishing a clearing office (that offers legal support and assistance but also crucial social and emotional support will prevent secondary traumatising through reporting),
- Offering anonymous counselling and reporting,
- Including the reporting services in public service institutions for accessibility reasons (schools, hospitals, police),
- Having clear and transparent procedures and means of dealing with reports,
- Offering supervision/psychological support to employees of reporting services as well.

## RESOURCES

Ainbinder, L., Division for Public Institutions and Digital Government, UN Department of Economic and Social Affairs (2022), [‘DESA Policy Brief No. 136: Promoting non discrimination in public administration’](#).

European Commission (2014), [‘Report from the Commission to the European Parliament and the Council. Joint Report on the application of Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin \(‘Racial Equality Directive’\) and of Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation \(‘Employment Equality Directive’\)’](#), Brussels, 17 January 2014, COM(2014) 2 final.

<sup>2</sup> Unpublished information provided during an interview with a city representative.



European network of equality bodies (EQUINET) (2012), ‘Tackling the “Known Unknown” How Equality Bodies Can Address Under-Reporting of Discrimination through Communications, An Equinet Report’, December 2012.

European Union Agency for Fundamental Rights (FRA), Working Group on hate crime recording, data collection and encouraging reporting (2018), ‘Hate crime recording and data collection practice across the EU’, Vienna.

Huber A., Hopp, L. (2021), ‘Mapping regional attitudes on discrimination based on ethnic origin in Italy, Sweden & Romania. A descriptive study’ The study is part of the European Commission funded project MINDSET.

## **SCENARIO 2: LOW LEVEL OF DATA BUT HIGH LEVEL OF AWARENESS OF DISCRIMINATION AMONG LOCAL AUTHORITIES**

Local authorities that are well aware of and committed to anti-discrimination and inequality in the city fit under scenario 2. Sometimes, they already have a local action plan in place or aim to develop such a plan. However, local authorities lack knowledge about the actual prevalence of discrimination in a certain area and the way in which it manifests.

As was mentioned in relation to scenario 1, the significance of complaint data is limited to reported incidents. Local authorities that do not deny discrimination just because there is no data (or a low number of reported cases) may request evidence on discrimination, its prevalence and concrete manifestations.

### **APPLIED PRACTICE: SITUATION TESTING TO GATHER EVIDENCE FOR DIRECT DISCRIMINATION**

Discrimination testing (sometimes also referred to as “situation testing”) is an experimental method used to reveal an unequal treatment (discrimination) of a person/group, which can be traced back to the ground, which is protected by the anti-discrimination law. The discrimination is revealed because a person/group with different and conflicting characteristics receives favourable treatment in a comparable situation. The interactive situation is therefore kept as constant as possible, only the characteristics of persons vary. Situation testing is primarily used to assess discrimination in the sense of accessibility barriers (access to housing, goods and services, employment). The following examples illustrate how situation testing works.

Pairs of applicants used in situation testing are formed in a way that makes them differ on the basis of characteristics that are protected by law (and to be tested). For example, two people apply separately for the same flat, but only one asks whether it is accessible/barrier-free or whether they may bring their service dogs. Two people (with equal qualifications) apply for the same job; one is called Peter, the other Abdullah.

### **EXAMPLES FOR CHARACTERISTICS AND THEIR MARKERS ARE:**

- Ethnicity/nationality/religion: name, dialect, accent,
- Disability: wheelchair, service dog,
- Gender: name, voice,
- Family composition: single-parent with two kids versus a couple with two kids versus a single person.

**EXAMPLES OF AREAS (AND ACTORS) TO BE TESTED ARE:**

- Housing (lessors, estate agencies, public housing),
- Employment (recruiters, job agencies, employers),
- Goods and services (shops, night clubs, taxis).

Situation testing establishes a form of roleplay where a person is placed in a position where he/she/they may discriminate without suspecting that he/she/they is/are being observed. Situation testing therefore sets out to create situations that provoke the reaction of a person (employer, lessor) who allegedly discriminated against someone, without showing that this behaviour is being observed.<sup>3</sup>

In order to be convincing, situation testing requires a high similarity between the group that is at risk of being discriminated against and the control group. Similarities are related to clothing, appearance, qualifications (job), income (housing), behaviour, time of appearance.

**Apply it if you need to**

- Raise awareness of the existence of discrimination and its manifestations,
- Take stock of direct discrimination (evidence) in access to (public and private) housing, goods and services, work,
- Identify social groups that are particularly affected by discrimination,
- Collect evidence for developing an action plan for equality in accessing goods and services.

Compared with statistical evidence that is more likely to prove indirect discrimination, situation testing is used to prove direct or systematic discrimination.<sup>4</sup>

**Tip!**

For situation testing, offer accompanying measures, such as workshops with lessors or intermediaries on discrimination, buddy projects to coach people who have difficulties in presenting themselves before estate agents or employers and legal information and advice on anti-discrimination laws. Offer these services in cooperation with a local or regional anti-discrimination office if possible.

**What you need: preconditions**

- An action plan or other forms of political commitment to an assessment of exclusion/discrimination in access to housing/work/public services,
- A city council decision on the tender and budget,

<sup>3</sup> Rorive I., Centre For Equal Rights (2009), 'Proving Discrimination Cases - the Role of Situation Testing', Stockholm, p. 42.

<sup>4</sup> Chalovska N. (2014), 'Situation testing: A method of proving discrimination', Skopje: Helsinki Committee for Human Rights of RM, p. 26.

- Legal advice on the legal consequences of situation testing in your city/country,
  - (Ideally) a local service provider who carries out the testing on behalf of the city,
  - A budget for one full-time or two part-time (50%) researchers for a year (indicative budget for testing three grounds for discrimination in the private housing market) as well as a budget for a part-time (50%) researcher for six months for updating/extending the testing; contributions in-kind of city staff for monitoring/briefing and PR,
  - Timeline of about one year (six months for updates/extensions) depending on the scope and characteristics/areas to be tested; testers could be university students.
- Select a coordinator for the entire testing-process,
  - Prepare the testing (scope, scenarios, questionnaires and template for field notes, means of documentation),
  - Conduct the testing, maintain presence at the testing location,
  - Interact with the testers (supervision, debriefing, collecting statements and experiences, exchange),
  - Compile documentation and conduct follow-up.

## Risk management

Experience from ECCAR cities shows that situation testing and particularly the publication of the findings causes resentment among those tested (operators of shops and services, housing sector, employers) and may disrupt relations with the city/authority. Understandably, labelling someone as discriminatory without them knowing that they are being tested could cause resentment. Experienced cities recommend conducting the following preventive measures:

- Be careful to ensure confidentiality when confirming funding for situation testing, as visibility can have an impact: as a city, you use public money to fund such testing. You therefore need to present your case and negotiate within the city council. Public disclosure of the information puts situation testing at risk. Public funding and confidentiality are hard to reconcile, however. In a situation such as this, you can only step forwards: the mayor (or politician in charge) sends a letter to all estate agents / job agencies / etc., saying that they are going to be tested via correspondence test. Although this measure will put testing at risk (biased findings), it will prevent discrimination to some degree. The experience of one city shows that discrimination declined significantly after situation testing was announced – in much the same way planning to introduce speed cameras usually reduces speeding to a certain degree.
- Cooperate with a local equality body (anti-discrimination office)
- Make use of legal advice on implementing situation testing in the specific legal context in your city/country.
- When testing discrimination in accessing work, there is the risk of being accused of forgery when submitting written job applications. Therefore, consider more informal application processes/expressions of interest in vacancies, e.g. by phone calls or showing up personally at the company to obtain information about a job.
- Commission a research institute (or university) to conduct the situation testing. It attracts less attention and increases the acceptance of outcomes.

### Limitations of situation testing: findings are questioned / denied / ignored

### How to deal with these limitations as a city

Even if the findings of the situation testing (e.g. in housing) indicate direct discrimination, estate agents may deny that they discriminate: they do not reject, but simply select. Experienced cities have therefore asked themselves: “How often do you have to test until it is accepted as evidence of discrimination?”

Raise awareness of anti-discrimination law; talk about biased motives for the selection; offer workshops with lessors and intermediates on discrimination; buddy projects.

Those accused of discrimination in the findings of situation testing, “defend themselves” with justifications for exclusionary prejudices. These include: previous experience with certain tenants, employees, features of the neighbourhood or prevention of conflict in the neighbourhood.

Raise awareness of prejudices and their effects on the life situation of people affected by them.

Even if the findings of situation testing are not doubted or denied, the sanctions for proven discrimination are too minor to have a deterrent effect. Actors continue to discriminate.

Even though the sanctions for discrimination are too minor in EU countries to have a deterrent effect, the threat of “bad” publicity does have an impact. Ultimately, non-discrimination requires awareness and an intrinsic motivation for equality. Intrinsic motivation and awareness-raising work takes longer and is more difficult than imposing effective sanctions that act as a deterrent. Awareness-raising does have a long-lasting impact, however.

Liberal housing market; demand for accommodation is higher than supply, which makes it easier to discriminate.

Leverages: media reports have an impact on the reputation of discriminatory lessors and estate agents; otherwise: lobbying and awareness-raising; City may provide funds for sanctions or give interest-free credit.

### POSSIBLE IMPACT

- Discrimination declines,
- Stronger awareness of discrimination in access to housing, goods, services and employment.

### HOW TO USE THE FINDINGS:

- Advocacy,
- Action plan (lobbying),
- Basis for awareness-raising and cooperation with private sector,
- Development of a charter with estate agencies on future cooperation in the field of non-discrimination.

### RESOURCES

Chalovska N. (2014), 'Situation testing: A method of proving discrimination', Skopje: Helsinki Committee for Human Rights of RM.

Rorive I., Centre For Equal Rights (2009), 'Proving Discrimination Cases – the Role of Situation Testing', Stockholm.

Verhaeghe P., Van der Bracht K., Van de Putte B. (2016), 'Discrimination of tenants with a visual impairment on the housing market: Empirical evidence from correspondence tests' In: *Disability and Health Journal*, Volume 9, Issue 2, April 2016, pp. 234-238.

### APPLIED PRACTICE: MEETING THE CHALLENGES OF INTERSECTIONALITY AND STRUCTURAL RACISM

As regards anti-racism policies and goals, the *International Convention on the Elimination of All Forms of Racial Discrimination (ICERD)* provides for the human rights standard at stake. ICERD defines racist discrimination as “[...] *any distinction, exclusion, restriction or preference based on race, colour, descent, or national or ethnic origin which has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise, on an equal footing, of human rights and fundamental freedoms in the political, economic, social, cultural or any other field of public life.*”<sup>5</sup>

The intersectional perspective – which calls for a different way of thinking about identity, equality and the power imbalances that place affected individuals at a disadvantage in terms of protection of their rights and access to public services, goods and opportunities – takes into account the multi-dimensionality of people’s experiences and identities. Multiple discrimination refers to a situation where persons are discriminated against in different areas, e.g., in access to housing, education and citizenship rights. All these forms of discrimination can be recognised separately. When it comes to intersectional discrimination however, a unique type of discrimination occurs, which combines several grounds for discrimination. The discrimination experienced cannot be “reduced” to one or split into more specific grounds. Rather, the persons are simultaneously affected by interconnected aspects of discrimination without one taking precedence over another.

Intersectionality is a more suitable concept for understanding the reality of discrimination.

<sup>5</sup> United Nations General Assembly, *International Convention on the Elimination of All Forms of Racial Discrimination* 21 December 1965, United Nations, Treaty Series, Vol. 660, p. 195.

Situation testing, as described above, fails in the case of intersectional discrimination. For example, if a Black man<sup>6</sup> has been denied access to a club, but a white man and a Black woman have been given access – what is it? Is it gender discrimination? No, because the white man got access. Is it racial discrimination? No, because the Black woman got access. It is rather likely that the discrimination is grounded in the specific intersectional combination of Black skin colour and male gender. Skin colour and gender cannot be looked at independently in this case – it is an interconnected combination of both characteristics that causes discrimination in access to goods and services. This is only one example that illustrates the complexity of detecting intersectional discrimination using the existing comparative approaches. The distinction, restriction, exclusion and preference are different for racialised people, depending on other characteristics.

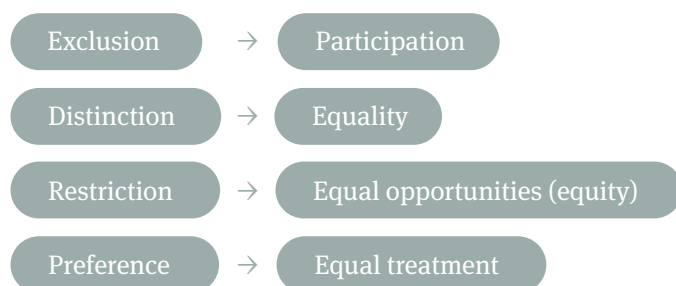
These interconnected aspects of intersectional discrimination form the reality in a complex world but pose challenges for equality data collection. Nevertheless, there are good practices on how to apply an intersectional approach to equality data collection.

The application of a human rights-based approach to equality data collection is most promising in this regard. The human rights-based approach to discrimination takes into account any distinction, exclusion, restriction or preference in accessing a right, with the characteristics of the affected individuals (i.e. skin colour) playing a secondary role. Racial discrimination itself as the prohibited behaviour is the starting point of research. The human rights-based approach to equality data collection is primarily rights-based, not characteristic based. At the same time, all initiatives aimed at preventing and eradicating discrimination are human rights initiatives in that they promote, protect and guarantee equality as a human right.

In the following, we discuss four methods for collecting or accessing data to scrutinise intersectional and structural discrimination. The pros and cons of each method are discussed too. Information stems from the city's application experience and from the knowledge of the European Training and Research Centre for Human Rights and Democracy (ETC Graz).

For the evaluation of data on structural and intersectional discrimination within the framework of a human rights-based approach, we recommend translating the prohibited dimensions of discrimination into policy goals, in accordance with the ICERD convention. Why? Firstly, the prohibited dimensions of racial discrimination are ambiguous; they can basically be assessed using comparable data on individuals with different ethnic origins. Secondly, these dimensions do not make a strong enough case for the requirement to guarantee human rights. Thirdly, it is difficult to derive policy recommendations from research findings based solely on the prohibited dimensions.

The translation of prohibited dimensions of discrimination into their opposites, however, enables policy recommendations to be derived from the research results. These are the following:



<sup>6</sup> Terminology based on the ECCAR [Guidebook on Local Actions against Anti-Muslim Racism](#).

Based on the research findings, recommendations can be targeted to close the gap between the real-life situation of the rights holders and the equality goals in the framework of local level competence.

### **Apply if you need to**

- Obtain context-specific evidence for crafting strategies aimed at preventing and eradicating intersectional and structural discrimination in access to public services,
- Tailor victim support services, because experiences of intersectional discrimination vary from one person to another depending on the number of causes, the ways they intersect, the spaces where they occur and the ways in which they manifest. This is particularly important because the process of accessing the right to justice must take into account the cases of multiple and intersectional discrimination that have impacted people.
- Gather information on how to improve the documentation of cases of intersectional discrimination and promote positive action measures to prevent and eradicate discrimination altogether. Intersectionality shines a light on the specific characteristics of those affected, shows the differential impacts of discrimination and identifies the specific needs and priorities of rights holders.
- Collect equality data to make visible structural discrimination on an institutional, cultural and individual level, enabling local authorities to counteract it through supporting measures.

### **What you need: preconditions**

- The political will to commission data collection (such data is rarely available to local authorities),
- A timeline of around one year,
- A budget for three part-time researchers and resources for contributions in-kind from local authorities (briefing, monitoring), community leaders and interviewers (where the researchers are not involved), and PR.

### **Impact**

Intersectional studies have revealed that:

- Using a single grounds approach, victims are presented in essentialist terms, which can render minorities within a minority invisible in the public sphere – both in broader society and within the minority group. They are also likely to suffer from discrimination within the minority group,
- Victims are more likely to experience more instances of discrimination than shown by single grounds approaches,
- Victims are more likely to suffer from aggravated forms of discrimination, which are often more intense and make the person more vulnerable in society,
- Victims are more likely to suffer from structural inequality in society, and to be at risk of poverty, social exclusion and marginalisation.



### *Complaints data*

The Barcelona Discrimination Observatory's methodological process considers organised civil society as active agents in the process of building knowledge about discrimination. CSOs are specialised in counselling and supporting victims of different grounds for discrimination. These organisations, which are active in anti-discrimination, counselling and support for victims, contribute quantitative and qualitative data on their discrimination cases on an annual basis. The data collected for the Barcelona Observatory also included these organisations' analyses of the political, socio-economic and regulatory context that affects their role as responsibility bearers in defending rights and reporting violations. Moreover, the Office for Non-Discrimination (OND) is the municipal service focused on addressing human rights violations related to different forms of discrimination. The OND adopts an intersectional perspective and rights-based approach in dealing with cases of discrimination. The OND is engaged in prevention (awareness-raising) and guarantee work (victim support and mediation). The OND's case data is also used for the Barcelona Discrimination Observatory, which analyses complaints data in line with the following categories:

- Discriminating agents,
- Areas where discrimination is taking place,
- On what grounds (intersectionality),
- Types of direct discrimination,
- Which human rights were violated,
- Types of responses to discrimination (support and assistance, reporting).

These categories have been identified by processing quantitative complaints data. Based on these categories, the data was analysed and the findings interpreted. The quantitative complaints data was complemented with qualitative information, namely first-hand accounts from those affected and analyses provided by the SAVD Board (Board of Entities with Service for Victims of Discrimination). This methodological process makes it possible to critically reflect on discrimination and its impact on life in the city.

The co-work of many different organisations that specialise in different discrimination grounds in their victim support is crucial for identifying and working on intersectionalities, and is mentioned as a success factor. Each of these organisations offers a different perspective and all organisations learn from each other. Concretely, the cases reported can identify more than one ground for discrimination

The Barcelona Discrimination Observatory applies a human rights-based approach to data collection. It thereby distinguishes between three actors in the field of discrimination at local level:

- People, organised citizens (rights holders),
- Organisations and private businesses (responsibility bearers),
- States, local governments, and their institutions and employees (duty bearers).

Each group has a fundamental role to play in guaranteeing the right to equal treatment and non-discrimination, and in recognising the human rights of all people in accordance and compliance with the national and international mechanisms created for their protection.



Benefits	Limitations
In-depth information about the prevalence and types of discrimination in the city as well as their impacts is gathered and analysed.	Applicable mainly in large cities with a good anti-discrimination infrastructure / a strong and diverse civil society sector. However, even in large cities with many specialised and holistic victim support services, there is still a problem with under-reporting and therefore biased data.
Standardised methodology allows identification of trends over the years.	Data collection is limited to reported cases.
Visibility of city's victim support, anti discrimination and counselling services as a side-benefit: the city's merits in combating and preventing discrimination become evident too.	Data stems from different organisations with different mandates and scopes of action (comparability and compilation is a challenge).
Data provides a solid and reliable basis for decision-making.	Resource-intensive

### *Quantitative data on the life situation of the racialised population*

The ETC Graz collected quantitative data on the life situation of persons with Black skin colour to research intersectional and structural discrimination at the local level in four Austrian cities.

A human rights-based approach was applied to this data collection: Human rights prohibit an impairment of fundamental and human rights on the basis of a racist categorisation. Following this approach, the study gathered quantitative data on the life situation of persons with Black skin colour in the four vital spheres of life, namely access to the legal system and authorities, to health care, to workplace and to public space. In order to assess the situation of people with Black skin colour throughout Austria as well as to draw comparisons, data was collected in four Austrian cities whose Black population is of comparable size.

The study examined intersectionality, in order to not define a group exclusively by being Black and ignore the differences in social positions and respective living conditions as well as individual differences between Black people living in Austria. One of the main questions was how categorisations such as gender, age, health, social position and other attributions interact with attributions based on skin colour. Intersections between different categorisations were therefore also taken into account.

Data collection was not intended to explore causes of racism or racial disadvantage. It set out to show whether the life situations of people with Black skin colour are influenced or at least shaped by racial disadvantages. When designing the questionnaire, NGO workers from the Black communities were interviewed as experts. The face-to-face interviews provided initial

insights into the life situations of the Black population in these four areas. Based on these insights, the questionnaire was developed and field-tested (pre-test). When preparing the field-work, intense consultations were carried out with members of the organised Black communities in the four cities.

Interviewers from the target group with skills in empirical research were recruited for data collection. 13 interviewers were informed about the aims of the project and trained to conduct the interviews. In this context, the questionnaire was tested and revised again, particularly regarding content and language (German / English / French). The trained interviewers selected the interviewees, using a quota plan, which was based on data from the national statistics office on the distribution of the general population in the four cities according to age and gender. No specific data on the Black population was available in official statistics.

A total of 717 personal interviews were conducted between April and December 2012. The sample was not randomised, as participation was influenced by readiness (voluntary participation) and the channels used by the interviewers. It was therefore not a representative sample of the total population of Black persons in Austria. Nonetheless, it was a quota sample that allows conclusions to be drawn on the life situation of Black persons in these four areas.

Benefits	Limitations
<p>Also includes information about unreported cases of intersectional discrimination and reasons for not reporting (dark figures).</p>	<p>Applicable mainly in large cities with a good anti-discrimination infrastructure / a strong and diverse civil society sector. However, even in large cities with many specialised and holistic victim support services, there is still a problem with under-reporting and therefore biased data.</p>
<p>Makes structural and intersectional discrimination visible.</p>	<p>Participation of racialised people throughout the whole data collection and evaluation process is to be ensured (outreach).</p>
<p>Allows standardised collection of quantitative data (quota sample); provides solid evidence for the life situation of persons with Black skin colour.</p>	<p>Risk of biased information (participation in the survey depends on willingness of interviewees); randomised sampling (representative study) is impossible for this target group.</p>

### *Qualitative data on intersectional discrimination*

Qualitative studies are suitable for exploring in more detail the life situation of those affected by intersectional and structural discrimination. These studies show that experiences of racism, racist processes of ascription and institutional exclusion are in interplay with socio-economic inequality. Narrative and problem-centred interviews show the experiences and consequences of experiencing structural and intersectional discrimination. They indicate individual and group-specific coping strategies (such as denial, political engagement, engagement in self-help groups, usage of city's counselling and support services) and allow an understanding of contexts and correlations.

The development of loosely structured interview guidelines that stimulate a narrative flow is recommended. As soon as any hint of (intersectional) discrimination arises, interviewers should be prepared to probe and stimulate an in-depth detailed description of the incidents and their consequences. After the description, interviewees are to be invited to interpret their experiences and their consequences.

Persons who do not report and seek support when they feel being discriminated against can be accessed via announcements in local media, social media or notices in public buildings. However, experience shows that these channels often only yield limited results. Seeking access to interviewees via adult education courses and institutions works better. Adult education organisations as well as placement agencies are gatekeepers to persons who are discriminated against, but do not necessarily report to the official bodies (or counselling centres). More information on qualitative data collection regarding intersectional discrimination is available in the UNESCO Centre's publication *Human Rights Go Local, Volume 2*.

#### Benefits

Allows in-depth understanding of the shape of intersectional and structural discrimination, its consequences for the individuals and coping strategies (= evidence for policy planning, action plan).

In-depth information on the needs and concerns of persons affected by intersectional and structural discrimination is gathered.

#### Limitations

Biased sample (access to interviewees is shaped by gatekeepers, readiness to speak on what has happened, awareness).

Sample sizes are either small or data collection is resource-intensive (significance of findings); qualitative data can provide initial insights.

## RESOURCES

Council of Europe, 'Intersectionality and Multiple Discrimination - Gender Matters (coe.int)' Web resource of basic definitions.

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### **SCENARIO 3: HIGH LEVEL OF DATA AND HIGH LEVEL OF AWARENESS OF DISCRIMINATION AMONG LOCAL AUTHORITIES**

This section may be of interest to local authorities that are aware of discrimination and inequality, are committed to taking action, and will benefit from plentiful data. These cities can benefit from their positive data situation, using it to regularly monitor implementation of the equality goals that are set down in their political agenda. Monitoring equality (in relation to these goals) may therefore help these cities identify trends over time and develop appropriate action.

#### **APPLIED PRACTICE: INEQUALITY AND DISCRIMINATION OBSERVATORY (POPULATION OF INDICATORS)**

This section provides information on three successfully applied practices of monitoring/observing equality using a variety of existing administrative, NGO and research data.<sup>7</sup> These practices monitor equality in terms of nationalities (migratory background), religion, gender and age. They do not monitor equality in terms of ethnicity/racialisation (as the data is not available). So far, racial discrimination is mainly monitored using proxy variables. A proxy variable is a variable used instead of the variable of interest when that variable of interest cannot be measured directly. Examples for proxy variables used to assess racial inequality include: nationality, migratory background, self-identification as a (recognised) ethnic minority, e. g. Roma/Sinti.

Equality goals are structured along the lines of local level action, such as: demographics and immigration law, participation, education, employment and the labour market, income and social security, health, housing, and living together.<sup>8</sup>

For all these fields of local level action, indicators were developed by a team of experts (city members, statisticians, local CSOs and topical experts). The set of indicators per field of action remains the same, to ensure comparability over the years. The following table provides some examples of indicators per field of action. ECCAR cities recommend holding a multi-stakeholder workshop to develop and refine the sets of indicators. Such a workshop will help achieve broad and wide participation with limited resources.

The indicators are then populated with sources of public data from official registers, sample surveys, EU data, CSO data, complaints data (more information on data is provided below). The Vienna Integration and Diversity Monitor, for instance, provides access to their data.<sup>9</sup> Experience shows that a dedicated department or at least a team within a department is needed for these tasks. In order to observe trends, monitoring is repeated in three to five years, depending on resources.

#### **LIMITATIONS AND STRENGTHS**

Generally, indicator-based monitoring allows any inequality to be assessed based on religion, origin, nationality or ethnicity. Gaps in access to rights and public services<sup>10</sup> can be identified and analysed as “origin gaps”. However, as the indicators are not aggregated, the significance of these indicators is related to trends and processes over time only. Assessing trends over time, such as the difference in the incomes of native inhabitants and those with a migratory background over the years, is nevertheless valuable for a city – particularly as they are related to political priorities and equality goals. Providing broad evidence for policy making is one of the most important strengths of equality monitoring. The most important limitation of indica-

<sup>7</sup> More than these three cities apply this or a similar approach to monitor implementation of equality goals.

<sup>8</sup> See, for example, the Vienna Integration and Diversity Monitor.

<sup>9</sup> See the Vienna Integration Monitor Dataset (Integrationsmonitor Wien).

<sup>10</sup> E.g. if the composition of city service users in terms of nationality and migratory background mirrors the city's diversity.

tor-based equality monitoring is that it needs a broad and solid base of data, which is collected regularly and comparably. Its practical implementation is therefore limited to larger cities. Already a very resource-intensive undertaking in itself, such monitoring is likely to be even more resource-intensive for smaller cities. Moreover, so far it has not measured racial discrimination as the data on ethnicities is not available.

### Apply it if you need to

- Provide solid evidence and fact-based information (proof) to calm emotional political debates (in the field of migration, equality, etc.) or perceptions of discrimination and inequality,
- Create awareness among city staff of their responsibilities in terms of equal access to public services: to counter the usual arguments of “our services are open to everybody, everyone is welcome” (→ but who is actually using them and does the user group mirror the target group?),
- Conduct an inventory (stocktake) of / track progress in achieving equality goals,
- Monitor trends in relation to equality and inclusion,
- Provide evidence to achieve greater equality and tailor measures, (for example, when recruiting city staff, providing city services, ensuring participation and access to information).

**Argument:** Inequality is not just a problem for those who are not equally treated, but for society as a whole: inequality severely affects social cohesion; various types of conflicts can be traced back to inequality and lack of social cohesion. Diversity and integration monitoring (and the identification of trends) functions as an early warning system for social conflict and provides a tool for promoting cohesion.

Measuring gaps is a type of policy tool for promoting change in city departments.

In particular, monitoring over time is an important basis for making political and administrative decisions. Monitoring is designed to help objectify public debates on (in-)equality and equal opportunities. It indicates progress or regression in the life situation of the city’s population, based on gender, ethnicity, nationality and other social statuses, as it is based on an indicator set and a standardised data collection mechanism. In this way, cities can identify policy areas in which they are getting closer to achieving equality or where they have moved away from equality goals and inclusion.

### What you need: preconditions

- Commitment from decision-makers in the city (top-down approach is a core precondition for securing the support of all city departments),
- An action plan containing equality / diversity / inclusion / interculturality goals that are to be assessed in terms of implementation status (trends, progress),
- Reliable data (from various sources, collected repeatedly and disaggregated by grounds for discrimination, such as gender, nationality, country of birth, age, sexual orientation, religion, etc.),
- Knowledge of data availability/accessibility to define the monitor’s scope (see also the

- mapping and baseline assessment described in step 3),
- A multi-stakeholder workshop (or other participatory event) to develop and refine the indicator set with broad participation by experts, racialised people and civil society. The workshop is organised by city staff (apply a holistic approach to equality and inclusion in the municipality, seek inspiration and guidance from existing indicators for gender inequality),
  - Infrastructure for periodic assessments in the framework of a comparative time series, including the retroactive analysis of trends over the last few years,
  - A municipal department that is responsible for monitoring and a team that consults and supports the data collectors and evaluators,
    - one person for the monitor, one person for legal issues related to data collection and evaluation and one project leader;
  - Funds/budget for commissioning an external organisation or internal staff,
    - Experience gathered by different cities shows that commissioning an external organisation is a good strategy as monitoring is more credible if it is carried out by someone other than the city staff themselves;
    - Where an external actor is commissioned however, the requirement of cost efficient use of public funding needs to be considered: remember to reserve time for a tendering, application and selection procedure.
  - Timeline of around one year per monitor in large cities > 500,000 inhabitants (including the following tasks: to refine indicators, identify and gather the existing data from various sources to populate these indicators, assess the outcomes, draw conclusions, prepare the report, PR) (for larger cities > 1 million inhabitants: 18 months). Take into consideration, however, that this measure is implemented every five years.
  - Even where an external service provider is commissioned, the city must provide (at least) one part-time staff member during monitoring. Concrete staff resources depend on:
    - scope of monitoring,
    - availability of data,
    - frequency of monitoring,
    - scope of service provision: only data collection or also data evaluation and report-writing).
  - Budget for incorporating city's corporate design into the report and for printing.

### **Anchoring anti-discrimination in the city's structure**

The core tasks and responsibilities of the city's monitoring team include coordinating, developing and refining indicators (in a participatory setting), planning and coordinating data collection mechanisms, coordinating access to existing information and data (reporting within the city), coordinating data evaluation and interpreting the findings, as well as extrapolating policy recommendations (participatory) and need for action.

Requirements for the coordinator (head/chair of the monitoring team) include a basic knowledge of socio-legal issues, having a good network in the city administration and civil society as well as soft skills such as resilience and an ability to tolerate and embrace ambiguity even when confronted with frequently conflicting framework conditions.



Larger ECCAR cities (> 500,000 inhabitants) recommend having

- A department-specific unit/person that is responsible for controlling,
- An interdepartmental coordination unit (mandated to manage the entire process),
- A data collection unit (department of statistics).

### Tip!

We recommend including in the monitoring group external experts/consultants (social scientists specialised in inclusion and racial discrimination who are up-to-date with current issues in the field). Remember to include representatives of racialised groups, including all social services/counselling institutions in the city that have first-hand knowledge of problems and are already collecting data.

#### **TASK 1: IDENTIFY AND ACCESS POSSIBLE DATA SOURCES**

National statistic agency's data: (adapted) employment statistics, population statistics, European Union Statistics on Income and Living Conditions (EU SILC), health and consumer surveys, micro-census as well as labour force and structure of earnings surveys.

Administration data: income report, criminal statistics (from the courts and the police), birth statistics, statistics of childcare facilities and other statistics collected by municipal departments.

Other survey data: surveys carried out in the city, e.g. quality of life survey, surveys on health behaviour or the psycho-social situation of people during the Covid-19 pandemic and own data collection mechanisms (diversity of staff in the city). Information and statistics from victim support services, women's shelters, counselling centres, hospitals and trade unions.

Indicator-based monitoring defines areas of municipal action and develops indicators, measuring the population's life situation in these areas. Municipalities also define concrete equality goals, using indicators to measure the status of implementation. The definition of equality goals is based on the cities' commitment, as enshrined in action plans or city principles outlined in the municipal code.

Routine data collection takes place every two, three or five years, in order to populate these indicators with data. This standardised data collection mechanism is suitable for recording an inventory of the situation in the population and for identifying trends.

#### **TASK 2: CONSIDER AND TAKE INTO ACCOUNT EXAMPLES FOR INDICATOR DEVELOPMENT**

The cities apply different approaches for developing indicators. Some cities have more of a conceptual focus (dimensions of equalities), while others are more policy-oriented (action fields at local level). Broad and wide participation in indicator development (including city staff, experts, members of CSOs and in particular racialised people) is something that all city representatives recommend.

According to the ECCAR reporting tool, it is larger cities (such as Vienna and Barcelona) that tend to conduct routine indicator-based monitoring. However, smaller cities are encouraged to engage in such monitoring too. The following table discusses the issue of city size and data availability.



**Tip!**

Consider the following aspects when developing monitoring:

- Highly diverse ethnicities, nationalities, cultural backgrounds (migration hubs); highly diverse socio-economic backgrounds pose a challenge in terms of identifying the influence of individual variables,
- Existence of reliable and repeated data collection mechanisms (municipal department for statistics, census data can be disaggregated according to residence, etc.) at the local level or in census data, which then can be disaggregated according to residence.

**EXAMPLES OF AREAS AND EQUALITY GOALS:**

Area and example of equality goals	EXEMPLARY INDICATORS	DATA SOURCE	
Political participation (equal participation in local politics and interest organisations)	Actors of local politics/political party: distribution by gender, age, migration background, racialisation	Administrative data	
	Proportion of persons with their main residence in the city aged 16 and over who are eligible to vote and who, due to their nationality have the right to vote, regardless of their length of residence	Census data	
	Legal advocacy groups and employee representation: distribution by gender, age and migration background, racialisation	Data from these bodies	
Training and further education (removal of segregation and exclusion)	Distribution of pupils/students in all school types by gender, age and migration background, racialisation	Municipal department of education	
	Distribution of school staff in all school types by gender, age and migration background, racialisation		
	Distribution in further education		Service providers
	Distribution of less well-educated persons (max. compulsory schooling)		Census data
Leisure and sport (ensuring an inclusive infrastructure in leisure and sports and increased diversity in leading functions in the area of leisure and sports)	Distribution of public service users in leisure and sports by gender, age, migration background, racialisation	Visitor statistics of organisers/organisations	
	Satisfaction with leisure and sports options close to home	Survey data (data collection to be requested)	
	Distribution of leaders in sports and leisure associations by gender, migration background, racialisation	Sports associations	
	Usage of public services in culture and sports	Data collection to be requested, e.g. as precondition for access to public funds	

Area and example of equality goals	EXEMPLARY INDICATORS	DATA SOURCE
Housing and public space (equal access to affordable and secure housing and to the public sphere)	Living arrangements and household types (rent or property, number of accommodation spaces, public or private housing, furnishing)	Census data
	Sense of security	Survey data (data collection to be requested)
	Use of parks	Data collection to be requested
	Decision-making bodies in housing and urban development (distribution by gender, migration background, age)	Administrative data

As a reference, you need census data (development of population):

Structure of the population (sociodemographic characteristics)	Age and gender structure	Census data
	Nationality (EU/third-country national), migration background (country of birth), population eligible to vote, racialisation <sup>11</sup>	
	Health care needs, disabilities (= entitled to social assistance, care services)	

Source: Vienna's Gleichstellungsmonitor (Equality Monitor – currently in German only).

#### OTHER RELEVANT INDICATORS:

Proportion of municipality employees from a migrant background (racialised) versus proportion of persons with migrant background (racialised) in the city,

Number and type of languages spoken by municipal staff members.

<sup>11</sup> We are aware that official data is rarely disaggregated along racialisation lines. Nevertheless, we need this data to monitor racial discrimination. As already mentioned, we now work with proxy variables such as nationality and country of birth.

**TASK 3: DECIDE ON THE FREQUENCY OF APPLICATION**

In cases where the monitor mainly serves to identify trends and processes in integration, an application of every fifth year is recommended.

If the monitor is designed to raise awareness of the issue and produce current integration and diversity data, we recommend you apply it every third year. More frequent application is difficult to implement.

**Risks/challenges****Mitigation measures**

No data on ethnicity is available in the city/country. The City of Barcelona, for example, measures “origin” by country of birth and nationality. However, this poses a risk that the situation of national minorities (e.g. autochthonous Roma and Sinti) or other types of racialised persons, who are natives in the country, is neglected.

Until data collection takes into account ethnicity and self-defined ethnicity is a legitimate category of sociodemographic data, working with proxy variables is better than having no data at all.

Similar to having gender-specific data to assess inequality, argue for collecting data on (self-defined) ethnicities.

Consider equality data that is based on proxies for ethnicity (country of birth, nationality) as a policy tool.

Research and consulting organisations are becoming increasingly internationalised, losing sight of the local level.

In your calls for tenders for the delivery of services, describe your city’s local structures, which form the core of such services. Do not underestimate the importance of knowledge of your local administration’s structures.

If you cannot access a research partner with this knowledge, reserve time and resources for briefings.

Experience shows that there is rarely political resistance to such monitoring (provided the mayor supports it).

The challenge tends to be that right-wing parties use the monitor's findings to lobby for their political agenda.

Be aware of the risks of data instrumentalisation.

Outline and express your concept and approach to inclusion and social cohesion: equal opportunities and participation; all inhabitants are "citizens", we all live together. Inclusion serves to promote social cohesion and peace.

Be clear and transparent about the monitor's methods and limitations (including data collection, evaluation and significance of findings).

→ worst-case scenario: keep the findings internal and consider only publishing at a later stage (in the meantime, use it as a tool to promote change within the public administration).

City officials are hesitant about data collection and "fear" the findings.

Make clear that keeping quiet and looking the other way is even less helpful when dealing with potential social challenges; routine data collection and monitoring helps assess progress immediately (even when starting from the lowest level).

Data of public service users: the more socio-demographic information is collected the more effort is required (increased workload for city staff).

Refer to similarities (e.g. gender differences, gender-related barriers / accessibility gaps) and their relevance for the development of adequate policies / supportive / empowerment measures.

The comparability and timeliness of your monitor may expire due to societal developments / initiatives (also at the international level).

Slightly adapt the monitor and scan these international developments; hold modules of monitoring constant to ensure comparability with your earlier monitors and maintain the visibility of trends and developments in your city over the years.

Data on city staff composition is personal data (data protection).

Apply internal data collection mechanisms and statistical matching.



If you break down large data sets (EU SILC or micro-census) into the inhabitants of the city, you have large statistical fluctuation margins because the number of cases becomes increasingly smaller.

This can be solved using time intervals: summarise the data over a three-year period and see if you can detect trends.



Ensure comparability of data over the years and at the same time acknowledge recent developments.

Comparability over the years also depends on the availability of data. Often certain data is no longer available or is available in a different form. At any rate, you can only strive for comparability. Nevertheless, make sure that the indicators do not change too much.



For every monitor, the best-bidder principle in public administration leads to commissioning new service providers for data collection and evaluation. Comparability and consistency of data collection and evaluation is difficult.

Ensure that quality criteria and staff requirements are clearly and constantly defined; Document the calculations and analysed variables in all monitors exactly to enable continuous handover from service provider to service provider.



How can complex calculations be translated into simple language, without “dumbing things down” or rendering information biased?

Work with visualisations, pictures and graphics. This is specifically relevant for smaller cities that do not have such detailed corporate identity requirements. Use data to tell stories.



Data collection mechanisms change over time in terms of questions, answer categories in survey data/content. This poses challenges in terms of populating standardised indicators and identifying trends over time.

Reflect on these changes in indicator population and reporting.



Current data or regional data missing.

City initiates the collection of this missing data (see methods/approaches above).



Data is collected but is not accessible to local authorities (data protection).



Standardised indicator population allows the identification of trends, but cannot acknowledge recent legal changes, recent social development, recent crises (COVID 19 pandemic, migration flows, etc.).

Consider a separate variable content focus per monitor.

## RESOURCES

City of Vienna (2023), [Gleichstellungsmonitor \(Equality Monitor\)](#), indicators and data, currently in German only.

City of Vienna (2023), [Integration and Diversity Monitor – Facts and Figures](#).

City of Nantes (2022), [Observatoire Nantais des discriminations – Rapport Final, Décembre 2022](#), currently in French only.

### *Applied practice: Monitoring the diversity of city staff (indicator-based)*

Similarly to the previous practice, here too indicators are developed and populated with data. However, here, data is to be collected within the city – it is city-internal data. By monitoring the diversity of city staff, a city can indicate how it values diversity across the board – both in its own organisation and among the population as a whole. Diversity monitoring supports the approach that the composition of city staff should mirror the composition of the local population. Diversity has to be understood in several dimensions, such as religious, cultural or linguistic diversity.

Diversity monitoring can also examine how the city's administration deals with the population's increasing diversity: Are the city's services, products and measures adapted to the different needs of residents? How is diversity management anchored in the city's departments and how is the diversity of the population actually reflected in the city's employees?

Methodologically, cities conduct diversity monitoring using an online survey of city staff. Ideally, all city departments and institutions participate in diversity monitoring. The survey's results provide the basis for evaluating diversity management in the city. Cities therefore use a set of "diversity scorecards" or benchmarks, which illustrate the extent to which services, personnel policies and organisational structures have been adapted to fit a socio-culturally diverse city.

**Tip:**

Does your city already analyse gaps and inequality relating to gender? Find inspiration in the gender equality indicators. Seek advice and copy approaches. Barcelona has developed its “origin gap report” and the corresponding indicators in accordance with the gender gap indicators in Barcelona and the diversity monitor in Vienna.

**LIMITATIONS AND STRENGTHS**

Diversity may manifest itself in many dimensions: cultural, religious, linguistic, ethnic, and racial aspects, etc. However, the way of measuring diversity is very limited and does not allow us to grasp all of its facets. One of the few variables that can be accessed at the level of availability of objective statistical data is place of birth and nationality. This information incorporates only part of diversity, i.e. information related to migratory processes. Other dimensions of diversity (particularly ethnicity) are more difficult to measure. This limitation was already addressed above in relation to monitoring equality.

**APPLY IT IF YOU NEED TO**

- Gain an understanding of diversity in your city staff,
- Obtain evidence for developing actions to become an equal employer and service provider as a city,
- Implement fair recruitment strategies, job advertisements,
- Get evidence for targeted recruiting and human resources policy,
- Get evidence for inequality in access to public services,
- Obtain information on your city staff’s linguistic skills.

**WHAT YOU NEED: PRECONDITIONS**

- Political commitment (from the mayor) to initiate a top-down process,
- A city department that coordinates diversity monitoring,
- Cooperation by all city departments in developing the indicator (holistic process).

**CONDITIONS FOR THE INDICATORS**

- The number of indicators must be limited (maximum 35) in order to constitute a true command and monitoring panel,
- Existing statistical funds must be current (this is a major limitation, given that statistical sources often do not plan to capture diversity),
- They must be periodic. In other words, a comparative time series can be drawn up and evolution in recent years retroactively analysed, where possible,
- They should incorporate gender-specific information where possible.

**WHAT MAKES MONITORING EASIER (EVEN IF THIS IS NO REQUIREMENT)**

- Existing data that only needs to be used to populate the indicators for diversity monitoring,
- Simple indicators and methods.



## Challenges

## Solutions

Data on city staff's ethnicity is missing or thin on the ground.

Work with the existing data, e. g. nationality and country of birth.

Difficult to convince all departments to support the diversity monitor.  
City departments are reluctant to collect further data (e.g. country of birth) on their staff.

Refer to the Action Plan (10 Points Plan of Action, other equality-related plans or diversity management).

Confront the departments with the indicators and be transparent on the data collection and processing methods. The indicator system serves as a tool for convincing city departments of the need to assess trends in the diversity of city staff.

Simplicity in your methods and approaches; understandable graphics and indicators.

Refer to the need for knowledge of the profile of service users, refer to the need for this data to populate equality indicators and assess and understand trends over time. Once you have evidence for these gaps, you can develop measures to close them. The idea of such indicators/data is therefore to promote change and avoid discrimination.

Monitoring findings are not favourable and the level of diversity among city staff is low. The city is therefore reluctant to publish the findings.

Evidence for low diversity among city staff is a motivator for action. Moreover, the findings do not necessarily need to be published. Diversity monitoring can also be used as an internal tool that is published within the city departments only.

**Tip!**

When arguing for equality data collection mechanisms to identify discrimination and inequality due to ethnicity, refer to gender (in)equality. Awareness among local authorities of the need for gender-specific data and evidence is higher: equality data collection on gender issues and gender equality indices have existed for decades. Local authorities are also quite familiar with these data and indices.

## RESOURCES

City of Vienna (2024) [Integration and Diversity Monitoring - Facts and Figures](#)

City of Barcelona (2024), Intercultural Indicators, Bretxa's 2023 report

*Applied practice: Outcome orientation: Assessing the achievement of equality goals*

A local authority that has equality goals (awareness at political level) and access to administrative and census data (good data situation), may apply outcome orientation to public budgeting to measure the effects of actions and resources dedicated to achieving these goals. Outcome orientation asks about the impacts that are to be achieved with actions and resources. The equality goals set in the political agenda and the governmental unit's responsibilities and competences are considered. In Austria, the outcome orientation was implemented at the regional level / level of metropolitan cities (Vienna). It focuses on equality and assesses the impact of measures and budgets spent on (progress in) achieving equality goals.

### APPLY IF YOU NEED TO

- Ensure transparency of budget use (according to the desired outcomes),
- Ensure transparency of political decisions and traceability of administrative procedures,
- Build public trust in local authorities,
- Ensure responsibility for policy outcomes (assessment of achievement is based on co-created indicators, including representatives from all city departments and civil society organisations),
- Assess (and raise visibility) of all departments' contributions to achieving the equality goals that were initially set.

### WHAT YOU NEED: PRECONDITIONS

Structural components:

- During budget planning, each department formulates up to five outcome objectives, which mirror their political priorities and core tasks. Criteria for outcome objectives are relevance, transparency, comparability, and verifiability,
- A department-specific controlling unit/person,
- An interdepartmental coordination unit (mandated to manage the whole process),
- A data collection unit (department of statistics),
- The introduction of outcome orientation takes time; sustainable changes in public administration need a period of several years.

### SUPPORTING COMPONENTS FOR INTERNAL COMMUNICATION:

- A project team whose members possess soft skills, resilience, and an ability to tolerate and embrace ambiguity even in the face of frequently conflicting framework conditions and decision-making requirements,
- A public relations officer, skilled in communicating and explaining complex content in easy-to-understand language,

- Technical and logistical means to enable effective public participation (particularly in controversial areas that may involve extreme opinions and interests, such as COVID 19 restrictions or protecting the environment during an energy crisis).

Simply put, outcome orientation has the following procedural steps:

- Defining the broader goals and concrete outcome objectives based on international standards, such as equality,
- Deriving the aspired impacts from these goals in terms of local level competences,
- Undertaking collaborative planning of targets to achieve the goals,
- Allocating the resources – budgeting,
- Monitoring the achievements.

Challenges	Solutions/coping strategies
<p>The introduction of outcome orientation requires a change of culture in public administration and is met with scepticism, especially during the early stages.</p>	<p>A project team with soft skills, resilience, and an ability to tolerate and embrace ambiguity, even when confronted with frequently conflicting framework conditions.</p> <p>A public relations officer skilled in communicating and explaining complex content.</p> <p>Implementing outcome orientation may take up to several years.</p>
<p>Tense culture of dialogue between politics and administration.</p>	<p>Generate a common understanding of issues and goals by referring to international human rights standards.</p> <p>Formulate a clear intervention logic.</p>
<p>The time lag of outcomes makes measurement difficult. A direct cause and effect relationship is more difficult to assess.</p>	<p>In addition to the target level, a suitable time horizon must also be defined and reflected on during the preparation process.</p>
<p>Establishing a common understanding of topics, scopes, and outcomes.</p>	<p>Make political visions for concrete measurable administrative practices by</p> <ul style="list-style-type: none"> <li>→ discussing cause-and-effect relationships transparently,</li> <li>→ using an intervention logic or</li> <li>→ considering domestic law.</li> </ul> <p>In-depth exchange on the meaning of topics and the scope to establish a common and context-specific understanding.</p>

More information on outcome orientation in public management, as well as the collection and use of equality data and research is available in the publications *Governing the City by Human Rights Objectives: Embedding Human Rights in Public Management Instruments* and in the *Outcome Document and Explanatory Remarks of the third Edition of the Human Rights Go Local. What Works Academy* (see references).

## RESOURCES

Austrian Directorate General for Women and Equality at the Federal Chancellery (2011), *Handbuch Wirkungsorientierte Steuerung. Unser Handeln erzeugt Wirkung*, (Manual for outcome-oriented management. Our actions create impact), Version 4, Vienna, currently only available in German.

Austrian state of Styria, Administrative Support Unit for Administrative Reform, Innovation and Strategic Project, *Wirkungscontrolling* (Impact monitoring), Graz, currently only available in German.

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UNESCO Chair in Human Rights and Human Security and International Centre for the Promotion of Human Rights at the Local and Regional Levels (2021), *'Human Rights Go Local: What Works. Building bridges between local governments and the scientific community to promote human rights, Outcome Document and Explanatory Remarks'*, Graz, 9 February 2021.

# A conceptual note on inequality and discrimination

Inequality and discrimination monitoring spans a broad field. Not all inequality is related to discrimination and not all discrimination brings about inequality. Although the two terms are often used interchangeably – especially by non-experts – discrimination and inequality are related, yet distinct, concepts.

**Discrimination** refers to the unfair or prejudicial treatment of individuals or groups based on characteristics such as race, gender, age, or religion. It involves actions or policies that create disadvantages for certain people.

**Inequality** refers to the unequal distribution of resources, opportunities, and outcomes among individuals or groups within a society. It can exist without direct discriminatory actions, arising from systemic structures, historical contexts, or economic disparities.

In summary, discrimination is an action or practice that leads to unfair treatment, while inequality is a broader state of imbalance in society.

For a local authority, discrimination can be observed and monitored by assessing complaints data, which is based on individual cases. However, discrimination observatories often include various sources of data on structural components of inequality. The concepts are mixed in practice. The ETC Graz suggests applying a human rights-based approach to observing and monitoring racial discrimination that is based on the ICERD. United Nations standards therefore provide the normative framework for assessing discrimination, which is also relevant to the local level. The legal dimensions of discrimination are (1) distinction, (2) exclusion, (3) restriction, and (4) preference of groups of society in their enjoyment of human rights in all areas of life – in terms of local level action. These four dimensions form the indicator's base for observing discriminatory effects of municipal human rights policies.

## RESOURCES

The Congress of Local and Regional Authorities' [Resolution on the promotion of human rights at the local level \(Resolution 334 \(2011\)\)](#) of which all municipalities are members.

The [ECCAR Toolkit for Equality](#).

United Nations General Assembly, [International Convention on the Elimination of All Forms of Racial Discrimination](#) 21 December 1965, United Nations, Treaty Series, Vol. 660.

United Nations Office of the High Commissioner for Human Rights, [Human Rights Indicators. A Guide to Measurement and Implementation](#), HR/PUB/12/5, New York and Geneva, 2012.

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The ETC Graz offers local authorities advisory services on human rights data collection. The specific services are agreed on a case-by-case basis, range from consulting and planning to implementation and are provided in the form of face-to-face or virtual meetings. More information is available on its website.

# PUTTING INTO PRACTICE

The previous section on developing the concept described several approaches and applied practices, depending on where your city stands in terms of awareness and knowledge of equality data collection. The following steps apply now again independently of the concrete data collection approach or the predominant awareness and knowledge scenario in your city. This section deals with (guiding through briefing) implementation of data collection, the interpretation of findings and processing them to compile policy recommendations. We also address the key issue of public relations.

## **7<sup>th</sup> Step: Decide on tendering and launch the call for tenders**

Local authorities may commission external actors with data collection, data evaluation or the provision of methodological or content-specific advice. Commissioning external experts has several advantages for the local authority: the credibility of research and the significance of the findings is less likely to be called into question if it is done by external actors (rather than by city staff). When it comes to monitoring diversity and equality within the city staff, an external actor is even recommended for quality assurance and credibility.

Local authorities can reduce the time required for data collection if they focus on leading the process and coordinating (city-internal) data protection. Moreover, local authorities do not necessarily have the skills and experiences needed for indicator development/refining or for data collection. Independent actors are therefore likely to collect or provide data to local authorities and evaluate it on their behalf. To this end, local authorities need to define the framework of commissioning by identifying the scope of services, the conditions, eligibility (quality) criteria for bidders, the timeframe, the budget as well as the risks to the tendering procedure and appropriate mitigation measures.

## **8<sup>th</sup> Step: Select the bidders and brief them on the scope of service**

Local authorities usually have an established framework for selecting bidders (e.g., selection of three bidders, contract awarded to the best service offer). Local authorities are advised to be prepared for an intense briefing of selected contractors regarding the scope of research and actions. The researchers need to know about the local level's scope of responsibility and decision-making capacities. Otherwise, the usefulness and relevance of the results is limited. To prepare for this briefing, ECCAR member cities with experience in commissioning external service providers with data collection recommend carrying out a mapping of responsible actors at the local level, their mandate, challenges and needs. The outcomes of step 2 can be used for this purpose.

### **UNIVERSITY OR ACADEMIA: RESEARCH**

University towns have a great pool of expertise for gathering knowledge onsite as regards which data collection partners are of local level relevance. The following pros and cons of working with universities were mentioned by local authorities.

**Pros**

Universities and academia can bring a totally new perspective to public servants and their work. Even if public servants share information at international level, they often have similar perceptions – due to the fact that they all work in the public service. The academic perspective, however, brings a completely new slant to public servants and their work. Academics could ask questions that are not relevant to the day to day work of administrative staff and are removed from daily administrative practice as such staff are often very focussed on a specific subject area and not used to applying a scientific perspective to their work. It is therefore refreshing for public authorities to obtain an outside view of critical questions and creative approaches and ideas.

**Cons**

Academics and researchers in general work externally for the public administration. Public servants therefore have to brief them intensively, which is frequently time consuming. Moreover, public servants should not expect to receive outcomes (research findings) that they can immediately use. Local authorities will need to “translate” the findings and make them relevant to their daily work.



### **EQUALITY BODIES, VICTIM SUPPORT AND COUNSELLING SERVICES: COMPLAINTS DATA AND POLICY RECOMMENDATIONS**

Victim support services and counselling centres are located either directly in the local administration or in civil society. Their work produces important data on discrimination and records and documents case files. Local authorities can use this documented work (e.g., City of Barcelona) to understand the prevalence, scope, area and magnitude of discrimination in the city, as well as progress of the cases and the outcomes achieved.

**Pros**

Low effort, as data is produced by these organisations anyway (in the course of documentation and registration).

**Cons**

Biased by the mandate of these organisations.



Cities' achievements in combating discrimination and supporting victims are visible.

Only reported cases are considered.



Service providers' opinions, expertise and recommendations can be used for developing and planning actions.





When implementing data collection, the following exchange with contractors is recommended for quality assurance:

- Regular meetings with researchers to keep research on track and the findings useful for local authorities,
- Local authorities provide researchers with contacts in the city (gatekeepers to procedural data and legal information),
- Local authorities support the researchers in staying on track (by constantly defining the trajectories of research).

These tasks are best performed by the working group on equality data collection (step 2). Depending on the thematic focus and individual requirements, external experts can be included.

## 9<sup>th</sup> Step: Derive policy recommendations from the research findings

Discuss findings and the consequences and consider that research provides local authorities with evidence for their political negotiations. Arguments derived from scientific research tend to have a higher value in political negotiations than those based on political interests. Here is a step-by-step guide to help local authorities derive useful policy recommendations from the findings:

1. **Choose a specific issue:** Select a particular human rights issue that is relevant to your local area. Ensure that the issue is well-defined and focused so as to provide clear policy recommendations.
2. **Assess the target audience:** Who are your recommendations intended for? It could be local government officials, community organisations, or other stakeholders. Understanding your audience and their mandates will help tailor your recommendations appropriately.

Structure of policy recommendations:

3. **Introduction and background**
  - Background information: Provide a brief overview of the human rights issue at stake, its historical context, and its current status in your locality.
  - Data and statistics: Describe the method and scope of data collection briefly to ensure that the evidence and the circumstances in which it was gathered are clear. Also describe the limitations of the significance of data.
  - Legal framework: Explain relevant legislation on the issue.
4. **Current situation in your city**
  - Causes and factors: Briefly summarise the research findings regarding the root causes and contributing factors of the human rights issue in your local context.
  - Impact/consequences: Briefly summarise the research findings regarding the issue's social, economic, and cultural impact on the affected individuals or communities.
  - Barriers to implementation: Briefly summarise any obstacles or challenges that hinder the protection and promotion of human rights locally, as indicated by the findings.
  - Outline the concerns and needs of the target groups of research.

## 5. Policy recommendations

- Specific measures: Propose concrete policy measures and actions that can effectively address the human rights issue. Make sure your recommendations are realistic and actionable.
- Benefits: Explain the potential benefits and positive outcomes that would result from implementing your recommendations.
- Legal and ethical justifications: Provide legal and ethical arguments supporting your recommendations. Explain how they align with existing human rights standards and principles.

## 6. Implementation strategy

- Timeline: Outline a timeline for the implementation of your proposed policies and action.
- Responsibilities: Specify who will be responsible for implementing each recommendation and how they will be held accountable (usually the target group of the recommendations).
- Resources: Estimate the resources (financial, human, and technological) required for implementation.

The following aspects will make your recommendations more effective:

- Address counter-arguments: Acknowledge potential objections or counter-arguments to your recommendations and provide reasoned responses to them.
- Review and feedback: Have your recommendations reviewed by colleagues or experts (researchers) in the field to obtain feedback and revise where necessary.
- Summarise your key points and emphasise the importance of addressing the human rights issue at the local level.
- Appendices: Include any supplementary materials, such as research methodology, research guidelines and references to data or case studies in the appendices.

## 10<sup>th</sup> Step: Go public with the findings

Using PR measures to promote sensitive human rights-related research findings, such as those related to racial discrimination and equality, requires a thoughtful and ethical approach. While the target audience for policy recommendations is mainly located in the local authority itself, PR targets a broader audience.

The following bullet points summarise aspects to be considered when planning PR activities for your research findings:

### 1. Acknowledge the historical context:

- Begin by acknowledging the historical context of racial discrimination in your city, recognising the long-standing systemic issues that persist.

### 2. Engage affected communities:

- Prioritise engagement with the communities directly affected by racial discrimination. Seek their input and perspectives to ensure that your PR efforts are respectful and aligned with their needs and concerns.

- 3. Cultural competency:**
  - Ensure that your PR team is culturally competent and sensitive to racial issues. This may involve diversity training and hiring staff from diverse backgrounds.
- 4. Language and messaging:**
  - Use inclusive and respectful language when discussing racial discrimination. Avoid language that may perpetuate stereotypes or harm marginalised communities.
  - Highlight the human impact of racial discrimination by sharing personal stories and testimonials where appropriate, with full consent and sensitivity.
- 5. Partnerships:**
  - Collaborate with organisations and individuals with expertise in addressing racial discrimination. This includes civil rights organisations, community leaders, and activists.
  - Seek endorsements or partnerships from respected figures within marginalised communities to lend credibility to your PR efforts.
- 6. Media engagement:**
  - Prioritise media outlets that have a history of responsible reporting on racial issues. Build relationships with journalists who understand the nuances of racial discrimination.
- 7. Community-led events:**
  - Support and participate in community-led events, discussions, and initiatives that focus on racial discrimination. Be an active participant in the dialogue.
- 8. Educational resources:**
  - Develop and share educational resources that provide context and background on racial discrimination. These resources can help the public better understand the issue.
- 9. Amplify solutions and action:**
  - While highlighting the problem of racial discrimination and inequality is essential, also emphasise solutions and actionable steps that individuals and organisations can take to combat it.
- 10. Social media engagement:**
  - Use the local authorities' social media platforms to share findings, add personal stories of those affected where possible or expert statements on the research findings and racial discrimination.
  - Engage in respectful and constructive conversations on social media, responding to questions and concerns with empathy.
- 11. Transparency:**
  - Be transparent about the data collection's scope, actors and methods.

**12. Crisis preparedness:**

- Develop a crisis communication plan specifically tailored to address potential controversies or backlash related to your PR strategy.

**13. Community engagement:**

- **Town halls and forums:** Organise community meetings, town halls, or online forums to discuss the research findings. Encourage open and respectful dialogue.
- **Engage local leaders:** Involve local community leaders or influencers who can amplify the message within their networks.

Recognise the sensitive nature of the research findings. Understand that discussing issues like racism can elicit strong emotions and opinions (also at the political level). Sensitivity is key throughout the PR process. Understand that not everyone will agree with the findings or support your perspective. Be prepared for both positive and negative reactions.

# FOLLOW-UP

## Key success factors

Stay engaged with your audience and advocate for implementation of your recommendations. Monitor progress and be prepared to provide additional information or support as needed.

1. No obligation to collect new data, as most data is already available in the city and only needs to be explored → use what is already there (enables rapid solutions),
2. Easy-to-understand indicators and systems and tools (simplicity),
3. Political support and commitment to a top-down approach.

# Sustainability

## **11<sup>th</sup> Step: Ensure structural anchoring of a human rights-based approach to data collection with reference to human rights standards**

Structural anchoring of equality data collection is the most important factor in ensuring sustainability. Where specific information or data is required, cities can commission (opinion) research institutes with studies or publish a call for proposals on specific equality-related topics. However, we recommend that data collection be structurally mainstreamed with reference to human rights standards and local policy priorities, to ensure that it serves its purpose when monitoring equality in access to public services and life realities and provide evidence for policymaking and identifying trends.

Local authorities are usually (made) aware of the fact that international, national and local norms (laws) that protect equality refer to the need for collecting equality data and monitoring discrimination. They are often already engaged in some form of reporting and monitoring (mostly carried out by victim support services). We recommend that local authorities that are not yet aware of anti-discrimination legislation at different levels refer to such legislation when setting up data collection mechanisms. Referring to relevant norms and enshrining data collection in legislation (within the framework of municipal by-laws or the national constitution) will ensure that such a mechanism is justified and therefore safeguard its sustainability.

### Milestones:

- Structural anchoring of equality data collection in a specific municipal department (e.g. integration),
- Municipal staff specifically dedicated to the monitoring and data collection,
- Secure budget for the monitor over the years.

## **12<sup>th</sup> Step: Ensure exchange and transferability**

The research and data collection concept, methods and approaches are internationally transferable. These approaches are rooted in human rights, which apply around the globe. It goes without saying that the approaches will need some contextualisation (particularly in the sphere of responsibility of local level). Research partners (academia, private or public sector institutes) are well trained in doing such adaptation work, however.

As regards the findings of such research, we recommend that several cities in one country network, share resources and conduct research together. Research findings are transferable and usable (relevant) in different cities within that country that are of the same (or equal) size. Using and accessing research therefore saves resources. Cities could form networks (together with ECCAR) and exchange information on research findings and distribute data collection among each other to either reduce resources or expand the research scope with shared resources. Last but not least, ECCAR has founded a new Working Group on Equality Data Collection that is headed up by the City of Barcelona.

# RESOURCES

Atanasova A., Open Society Foundations (2014), [‘Equality Data Initiative’](#), background paper.

Council of Europe, Intercultural cities programme, Training on equality data collection and analysis to prevent and address systemic discrimination, Webinar, [Module 1: Equality Data – Purpose and Principles](#).

Department of Justice and Equality of Ireland (2017) ([Data and Research Strategy 2018 -2020 | European Union Agency for Fundamental Rights \(europa.eu\)](#)), website and summary of content, compiled and published as promising practice by the European Union Agency for Fundamental Rights. Contains information on why the practice is needed, how it was implemented, key outputs and success factors as well as technical information and contacts.

European Commission, Directorate General for Justice and Consumers (2021), [Guidelines on improving the collection and use of equality data – Publications Office of the EU \(europa.eu\)](#) These guidelines were developed by the [Subgroup on Equality Data](#). They are intended to provide practical guidance to member states on how to gradually improve the collection and use of equality data. The focus lies on quantitative data, collected coherently across countries, providing standardised outputs. The relevance of these guidelines for the local level is limited, but they still provide important basic information, definitions and principles.

European Commission, Directorate-General for Justice and Consumers, [‘Analysis and comparative review of equality data collection practices in the European Union – Legal framework and practice in the EU Member States’](#), Publications Office, 2017, country-specific information on the practices and legislation relating to data collection.

European network against racism (ENAR) (2015), [‘Equality Data Collection: Facts and Principles’](#), 6 pages, contains basic information on equality data collection. It dispels common stereotypes (e.g. that equality data collection is illegal or expensive) and includes minorities’ perspectives on equality data collection (referring to a FRA study) and good collection practices, e.g. how to add categories to national censuses and recommendations.

European Union Agency for Fundamental Rights (2023), [‘Fundamental Rights Report – 2023. FRA Opinions’](#), Vienna.

European Union Agency for Fundamental Rights, Subgroup on Equality Data to help Member States improve the collection and use of equality data. The Subgroup met in April, June and December 2018 and in March 2019. It combines thematic discussions on topics that are of common interest to equality data, the exchange of practices and new developments in EU Member States and Norway. It works on specific outputs that improve the collection and use of equality data. Work on the three outputs ([guidelines](#), [compendium](#), [diagnostic mapping tool](#)) included several rounds of discussions based on drafting proposals, as well as written comments from **Member States**. This helped reach consensus and ensured that they met the needs of Member States.

The FRA's diagnostic mapping tool is available for download as an xls-spreadsheet. It can be used by Member States to map existing sources of equality data and identify gaps in data related to specific grounds for discrimination and/or areas of life, as recommended by Guideline no. 1. The information gathered through the mapping tool can also be used as a basis for setting up a data hub on equality and non-discrimination, as recommended by Guideline no. 3.

UNESCO Centre for the Promotion of Human Rights at the Local and Regional Levels (2023), 'Governing the City by Human Rights Objectives: Embedding Human Rights in Public Management Instruments', in: Oberleitner G., Starl K. (eds), Human Rights Go Local Publication Series, Volume 4, HRGL Publishing, Graz, 2023.

UNESCO, Executive Board (2022), 'Follow-up to decisions and resolutions adopted by the Executive Board and the General Conference at their previous sessions, Part I: Programme issues: UNESCO Roadmap against racism and discrimination', 214 EX/5.I.A.INF, programme and meeting document.

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