Submission on the Draft Equality Data Strategy

Age Action is Ireland's leading advocacy organisation on ageing and older people. Age Action advocates for a society that enables all older people to participate and to live full, independent lives

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Introduction

Age Action welcomes the development of Ireland's first Equality Data Strategy. Reliable, timely data is an important resource to allow inequalities to be identified and solutions developed. Without the data, it is that much harder to hold public agencies to account for the fulfilment of their equality and human rights duties.

Older people are often subject to age-related stereotypes, prejudice and discrimination.[1] The issue of age-related equality data is of particular concern to older people. One in 12 or 8% of older persons reported discrimination in accessing services in Ireland in 2019 (up from 6% in 2004), and 4% reported work-related age discrimination (up from 0%).[2]

'Age' is a protected characteristic under the Equality Acts, and it represents a commonly collected data. While recognising that data on some other equality grounds may not be collected at all, there are nonetheless major concerns with how age data is collected and/or presented in official data. The World Health Organisation (WHO) has identified ageism in common practices used to generate data on older persons.

Age Action would like to see much stronger commitment in the Equality Data Strategy to collecting age-related data in a way that will allow deeper analysis, including the intersection of multiple variables—such as age, gender and ethnicity—so that situations of multiple or cumulative discrimination can be identified in the data.

This submission addresses the four sections of the strategy:

1. Collection of Equality Data
2. Standards and Classifications for Equality Data
3. Use of Equality Data
4. Monitoring and Oversight Actions.

1. Collection of Equality Data

Over one million people aged 60 or older in Ireland—representing one in four adults—yet older persons are often lumped into a single category of 60+ or 65+, without disaggregating the data.

The World Health Organisation (WHO) identifies that "ageism also manifests itself in the way statistics and data are collected and compiled. Examples include data simply not being collected about older people or when such data are collected, they are not disaggregated. For instance, many public health data sets […] lump all data into a single age group of >60 years or >65 years, thus hiding the vast diversity among older people."[3]

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[1] See, for example, WHO (2021) *Global Report on Ageism*. https://www.who.int/teams/social-determinants-of-health/demographic-change-and-healthy-ageing/combatting-ageism/global-report-on-ageism

[2] https://data.cso.ie/table/EQQ12

[3] https://www.who.int/teams/social-determinants-of-health/demographic-change-and-healthy-ageing/combatting-ageism/global-report-on-ageism

The draft Equality Data Strategy states: "The CSO equality data audit 2020 found that in the Irish system age is well collected". This over-simplified what the CSO found in 2020. The CSO also noted that data gathered in age groupings "impacts on the ability to carry out meaningful analysis on people of different ages" and "poor granularity for age is particularly evident amongst older and sometimes younger age groups. Of the five data sets collecting age groupings, one data set has its eldest grouping as '55+', three have '60+' and two have '65+'."[4]

Recommendation 1: The Equality Data Strategy should acknowledge the deficits in current age-related.

Data should not be collected by asking people to tick a box to indicate what age cohort they belong to, as this is done inconsistently by different organisations and even by different forms administered by the same organisation. When data is organised by different age cohorts, it becomes much harder to compare and cross-reference data from different sources.

Recommendation 2: The Equality Data Strategy should require data on older persons to be collected by year of age or date of birth, to allow disaggregation by different cohort.

There is a concern that some data collection imposes arbitrary age caps, which leads to systematic discrimination against older persons. For example, the WHO reports that exclusion of older people from research about sexually transmitted diseases (STDs) may have exacerbated a situation where rates of STDs are rising among older people, who may be at greater risk due to the lack of information or campaigns targeted at them, a lack of sexual health services for older people, and a fear of encountering ageist attitudes towards their sexuality.[5]

Some Irish examples highlight how data collection decisions can shape official understanding of issues, to the detriment of older adults.

- Until 2020, older adults (75+) were not asked about internet use.[6] This data hid the fact that most of the 350,000 adults aged 75+ were not using the internet and created a falsely optimistic picture that public services could be delivered online.
- The Adult Education Survey only surveys people aged 18 to 64,[7] despite referencing 'lifelong learning'.
- The Live Register data excludes adults aged 65 or older,[8] despite that not everyone aged 65 is entitled to the contribution-based Benefit Payment for 65-Year-Olds.

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[4] https://www.cso.ie/en/methods/methodologicalresearch/rp-eda/equalitydataaudit2020/outcomeforeachdimensionofequality/
[5] https://www.who.int/teams/social-determinants-of-health/demographic-change-and-healthy-ageing/combatting-ageism/global-report-on-ageism
[6] https://data.cso.ie/table/ICA76 and previous surveys before this dataset
[7] https://www.cso.ie/en/methods/education/adulteducationsurvey/
[8] https://www.cso.ie/en/methods/labourmarket/liveregister/

- The HSE no longer publish age-disaggregated data for trolley patients, despite older persons being disproportionately affected.

An example of age caps in data collection includes statistics on the labour force, which typically only report on people up to age 64. For example, the ILO Employment Rate (15-64) is a standard statistic that systematically excludes older workers. In Ireland this is particularly inaccurate, because the State Pension age is 66 and many people continue to work at age 65. In the latest statistics from the Quarterly Labour Force (QLF) survey, the employment rate for people aged 15-64 excludes the 102,500 workers aged 65 and older.[9] The QLF also provides data on workers aged 15-89, which is more accurate than 15-64. However, there should not be any maximum age to this dataset, as with increased longevity and possibilities for flexible work, there are likely to be more workers in their 90s in future years.

Removing age caps will change certain key indicators. For example, the reporting employment and unemployment has historically only referred to people aged 15-64 or 15-74, whereas a future-proofed and equality-proofed version of these statistics should provide data on the whole population. Changing these indicators would be in line with government policy to encourage and support those who wish to work beyond traditional retirement age.

Recommendation 3: Where age caps cannot be justified in a dataset this should be identified as an equality data gap.

The draft strategy notes the importance of intersectionality, but it does not have a corresponding action. On a related point, the issue of cumulative advantage/disadvantage is raised by the WHO and datasets should allow for disaggregation on socio-economic grounds to allow for this kind of analysis.

Sufficient sample size is needed to allow more detailed analysis of data, including intersectional analysis by multiple variables (e.g. age, gender and family status). While this should be possible for administrative data, greater investment will be needed in surveys to raise the sample size.

Recommendation 4: The Equality Data Strategy should recommend greater investment in surveys to increase sample sizes to facilitate deeper analysis of data, including intersectional analysis.

Some members of the community belong to minorities, such as Travellers. As a result, ordinary surveys may not capture sufficient data to allow for meaningful analysis of their characteristics. For example, a survey might provide data on Travellers, but the survey sample might be too small to allow analysis of older Travellers in isolation.

Recommendation 5: The Equality Data Strategy should recommend the over-sampling of minority groups for certain surveys, to allow for meaningful analysis

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[9] https://data.cso.ie/table/QLF18

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of data from an equality perspective, including the interaction of multiple protected grounds and other equality characteristics.

Noting that many (6 in 10, over 600,000) older persons are digitally excluded because they are not using the internet or have below basic digital skills, the Equality Data Strategy should note that surveys that are conducted exclusively online are skewed against the inclusion of people not using the internet and will be inaccurate to a significant extent in relation to older persons. A similar concern arises with respect of the analysis of administrative data collected online, unless data from paper-based forms are added to the same databases. Given that older age is the greatest indicator for who is digitally excluded, any decision to conduct a survey through digital channels only is an informed decision to exclude older people, especially the majority over the age of 75 who are not using the internet at all.

Recommendation 6: The Equality Data Strategy should recommend against digital-only surveys and should recommend steps (including telephone, postal of face-to-face surveys) to supplement digital survey methods, to ensure an accurate sample of all older persons, including the majority who are digitally excluded.

2. Standards and Classifications for Equality Data

The standards for age-related data should address the ageism of lumping all older persons into a single 60+ or 65+ category.

Recommendation 7: As a basic standard for age-related data, it should be a requirement that data on older persons is published in a disaggregated form showing at least every decade of age separately (i.e. 60s, 70s, 80s, 90s+).

Recommendation 8: Where age data is not adequately disaggregated, this should be identified as an equality data gap.

In working towards best practice, especially with advances in online databases drawing on administrative data, it should be possible to have more flexible options available so that data users can choose how data is organised. Some of this kind of functionality is already available in CSO and Eurostat datasets where users can correlate variables. For example, online tables could allow users to choose the age ranges displayed, which would increase comparability with other datasets.

Recommendation 9: Best practice guidelines and technical assistance should encourage the publication of data in online formats that allow for greater levels of user modification of data aggregation.

Attention should be given to the fact that older persons may not self-identify in the same way as younger persons. For example, based on a conservative estimate of 2-3%, some 20-30,000 older persons are likely to have a sexuality other than heterosexual, but they may not self-identify in the common categories of LGBT+.

Recommendation 10: In the development of standards and classification of data on the equality grounds, consideration should be given to the applicability of key words or labels to the lived experience and self-identification of all adults.

The Equality Data Strategy focuses on quantitative data and statistics, however some guidelines should be produced in relation to collecting and reporting on qualitative data relevant to the equality grounds.

Recommendation 11: Best practice guidelines and technical assistance should relate to qualitative as well as quantitative data collection and analysis.

Some organisations have ceased publishing data citing GDPR concerns, such as the HSE no longer publishing waiting list data for people aged 65+.

Recommendation 12: Best practice guidelines and technical assistance should explicitly address the interaction of GDPR and the need to publish disaggregated data, and this should clearly indicate where GDPR should not be a barrier to the publication of data.

3. Use of Equality Data

A UN report ('Human rights of older persons: the data gap') examines the significance of data for the realization of the human rights of older persons, as a prerequisite for evidence-based and informed decision-making and action.[10]

Ireland is a signatory of the Madrid International Plan of Action on Ageing, which in its political declaration recognise the challenge of "the lack of data availability, in particular age-disaggregated data, in many countries". In addition, "the importance of research, data collection and analysis in supporting policy and programme development is stressed as a key priority for national Governments".[11]

An important consideration, currently absent from the Equality Data Strategy, is that the purpose of data collection and publication should not just be to report on compliance with the Equality Acts but to inform planning of public services, allocation of resources and other interventions that prevent and remedy discrimination and to reduce inequalities. For example, the draft notes the relevance of the Public Sector Equality and Human Rights Duty but does not have a corresponding action.

Recommendation 13: The Equality Data Strategy should note that the Public Sector Equality and Human Rights Duty creates a positive duty on public bodies to invest sufficiently in data collection and analysis to allow for issues of equality or discrimination to be monitored.

In relation to guidelines and best practice for the use of data related to the equality grounds, the Equality Data Strategy should address areas where some current

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[10] https://documents-dds-ny.un.org/doc/UNDOC/GEN/G20/176/53/PDF/G2017653.pdf?OpenElement
[11] https://www.un.org/development/desa/ageing/madrid-plan-of-action-and-its-implementation.html

statistical indicators reinforce inequality or discrimination. This is, for example, relevant to the development of indicators for equality budgeting.

For example, the WHO criticises the dependency ratio as "another instance of ageism as, in effect, it assumes that all older people are dependent." The 2023 NESC report on the economy address the dependency ratio, as follows: "it should be noted that the dependency ratio (the number of people aged 65 years and over as a proportion of the number of people of working age) is a problematic metric. It assumes that everyone over the age of 65 is a dependent, whereas one in nine people in Ireland over that age are in employment. It does not reflect the ability, willingness, necessity, or desire among many older people to continue working."[12]

Another problem with the dependency ratio is that it only focuses on paid work. The dependency ratio would be 'improved' if unpaid carers were in paid work. Yet if unpaid carers were not working as carers, there would be a greater cost to the state to fund care staff, which is precisely what the dependency ratio is meant to measure.

It would be possible to replace this with a more accurate indicator that compares the proportion of all adults who are economically active, including full-time carers, with those who are children or else adults who rely on a weekly social protection income.

Recommendation 14: The Equality Data Strategy should recommend the discontinuation of indicators such as the 'dependency ratio' and their replacement with more accurate, non-discriminatory indicators.

Recommendation 15: In building the capacity for public service bodies on using equality data, there should be training provided on how datasets can include and reinforce discrimination by 'locking in' prejudicial assumptions.

4. Monitoring and Oversight Actions
Recommendation 16: Given the known deficits in data relating to older persons, the Equality Data Strategy Steering Group should include at least one independent expert on this topic (e.g. a social gerontologist).

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[12] See Box 1.1, page 6 https://www.nesc.ie/app/uploads/2023/04/160_understanding_economy.pdf