Dear Rt. Hon. James Brokenshire MP,

We are writing in response to your request for information on how to ‘build integrated communities’ in the UK. We have already responded using the online form. This letter outlines the framework that guided our response. We hope it will make our thinking and the evidence clear. This response has been primarily drafted by the Runnymede Trust but it also has support from Race on the Agenda (ROTA).

About Runnymede

Runnymede is the UK’s leading independent race equality think tank. Since our founding in 1968 we have provided evidence on the experience of black and minority ethnic people living in the UK, and on how the UK can build a society based on mutual respect and equal opportunities for everyone.

In this letter, we evidence the inequalities faced black and minority ethnic (BME) people in Britain and how these act as barriers to building integrated communities. We are concerned that the consultation questions were all framed in a manner that led to particular answers, making it difficult to disagree strongly with any of the suggestions. We are apprehensive about how the responses to these leading questions will then inform policy development. If agreement with these questions is seen as implicit support for the suggested strategies in the Integration green paper, it may be overstating their support among experts and civil society actors.

English language funding and provision

We welcome the government’s commitment to, and focus on, English language provision. To be effective, funding needs to be targeted appropriately to those in need of support. Every migrant understands the need to learn English, to improve education outcomes for their children, to access workplaces and shops, and to support their family’s health needs.

Rather than highlighting the near universal commitment to learning English we heard a misleading use of statistics by the then Communities Secretary when the Integration Strategy was launched. It was suggested that most Bangladeshi and Pakistani women cannot speak English, or that most of those who don’t speak English are Bangladeshi and Pakistani women. However, very few people (138,000) speak no English at all, just over 20% (not most) of whom...
are Bangladeshi and Pakistani women (and they are a smaller 15.7% of the larger numbers of those who don't speak English well).

There is certainly a need for language support for Pakistani and Bangladeshi women, though this is mainly necessary for older women. Government should note that this is unlikely to result in major labour market gains among over 60s in particular. Considering the large integration gap for BME people in education, employment and political participation, it is concerning that so much emphasis was put upon Bangladeshi and Pakistani women, not just in terms of accurate analysis, but in terms of designing the right service. Newer arrivals and some refugee communities should be the focus of efforts to improve language proficiency, and they are unlikely to have the same barriers as Bangladeshi and Pakistani women.

English language classes (ESOL) need to be funded adequately to fulfil demand. By this measure the integration strategy is clearly insufficient: the whole integration strategy has only been given £50m in funding, when £132million has been removed from ESOL alone between 2010 and 2015.1

### Economic inequality and social cohesion

We welcome the government’s acknowledgement of ethnic inequalities in the labour market. This is one of the largest integration gap between BME people and White British people.2 The Strategy recognises the role of geography in affecting outcomes in the local labour market and we look forward to the Department for Work and Pensions work on hotspots. Our work with the Greater Manchester Combined Authority and Liverpool City Region supports the recommendation in the Strategy, that local solutions with employers and community organisations is necessary to reduce inequality.3 In our integration briefing (attached) we outline some further recommendations to improve labour market outcomes locally and nationally. Getting accurate data on a local level is integral to scope the scale of inequality to be tackled. Our Race Equality Scorecards project showed that this is possible, despite the challenge of data not being collected uniformly.

### Isolation and segregation

We are pleased that the strategy promises to look at how housing policy can contribute to segregated communities. However, we are concerned and surprised that the strategy lumps all non-White people together as a homogeneous group to suggest a novel way of measuring

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segregation. The strategy notes that 429 wards were majority non-White in 2011, an increase since the 2001 census. This is a previously unused but also poor and divisive measure, suggesting that if a black family moves into an area that was previously 50% white, the neighbourhood becomes segregated overnight. Instead of this new, arbitrary measure of segregation, we should instead use the index of dissimilarity, which rather suggests that most of those 429 wards are the most integrated in Britain. At ward level, ethnic groups do live in greater concentrations. Even so, there are only 16 wards (and none in London) out of 8500 where one ethnic minority group makes up more than 50 per cent of the population.

The strategy might have instead noted data that on average White British people live in local authorities where they are 85% of the population. Since 1991 and 2001, ethnic minority people and also the White British populations are now more evenly spread (less residentially segregated) across Britain. On average, ethnic minority groups live in local authorities where their ethnic group is less than 10% of total area population.

A better approach is to consider how housing and asset inequality encourage segregated communities. While 68% of White British households own their home, this is only at 39% for Bangladeshi and Black Caribbean people. This limits residential opportunities for some ethnic minority groups and thus social mixing opportunities, which could also be facilitated by building more social housing to meet demand.

More generally, tackling socioeconomic inequalities will also improve integration and social mixing. Academic evidence shows that it is deprived areas rather than diverse areas that are generally less cohesive. Therefore integration policies should focus on areas of deprivation and poverty. However, in order for integration policies to be effective they should focus on “entire geographical communities” rather than only any one group or community.

British Values
We support the provision of more and better information for migrants ahead of their arrival and upon arrival to Britain. However, we are unconvinced by the government’s current framing of British Values. The evidence is clear; as noted in the Strategy 85% of people report feeling a strong sense of belonging to Britain and 81% say their local area is a place where people from different backgrounds get on well together. Once differences in income and education are adjusted for, all ethnic groups express a similar level of support for these British values.

We disagree with the idea that migrants do not understand British values or rights, or indeed that the British state (especially the Home Office in its immigration policies) has in fact always affirmed those rights and values. The proposed integration approach doesn’t seem to recognise the actual experience of migrants (and their children), nor how current immigration, economic and social policy is undermining values of fairness, respect and even the rule of law.

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4 Khan, O. (2016) ‘Segregation isn’t where white people are a minority’ Race Matters (Runnymede blog)
https://www.runnymedetrust.org/blog/seggregation-istn-white-minority

5 This has been noted by the Economist: ‘White shuffle, not white flight’ The Economist (2016):
https://www.economist.com/international/2016/01/09/white-shuffle-not-white-flight see also their related piece on ‘The Great Melting’ https://www.economist.com/international/2016/01/09/the-great-melting


Immigration policies can significantly undermine the integration of new migrants as well as existing settled British ethnic minorities. The recent Windrush scandal not only ran counter to the British Value of fairness but cast doubt in the eyes of the public, of the government’s commitment to those values. But the scandal is not the outlier government seems to claim. Immigration policies, such as Immigration Acts 2014 and 2016 combined with ‘mistakes’ by the Home Office actions (e.g. deportation letters to EU migrants) have created ‘hostile environments’ for migrants through removing legal aid, appeal rights for immigration decisions; increasing citizenship and court fees; and impeding access to healthcare and private accommodation. Fifty years on from the 1968 Race Relations Act that finally made the ‘no dogs, no Blacks no Irish’ signs illegal, it is disappointing that the government is making it rational for landlords to discriminate on grounds of race through its 2014 Immigration Act, and doesn’t recognise the discriminatory effects of its policies, whether indirect or not.

Equally, if government want school pupils to accept and engage with ‘fundamental British Values’ and demonstrate ‘attitudes that will allow them to participate fully in, and contribute positively to, life in modern Britain,’ then they should make sure all pupils fully understand the history of migration and colonialism in the making of modern Britain. We hope the newly established Windrush Day will pave the way for this true reflection on our past – both when we affirmed the values of fairness and the rule of law and when Britain’s past actions fell short of the values we now profess.9

Conclusion
For integration policies to be successful they need to focus on entire geographical communities rather than any one group or community. The best way to improve opportunities and interactions within and across individuals and communities is to reduce ethnic inequalities in education and at work. This is where the majority of people spend most of their day having to work towards joint goals with people different from themselves. Equally, tackling prejudice and poverty will reduce divisions and help engender belonging, especially where politicians and other public figures show leadership.

We have outlined the evidence on the barriers but also the most fertile grounds for solutions to ensure Britain becomes a more confident and fair society. We enclose our Integration briefing that outlines solutions for positive change in more detail.

We welcome the government’s commitment to thinking strategically across government about integration, opportunity and equal citizenship, and welcome an opportunity to discuss our response further.

Yours sincerely,

Dr Omar Khan
Director

9 See our website, which won a Royal Historical Award for best online resource, www.ouromigrationstory.org.uk, and was developed to support teachers and schools and parents seeking to teach the relatively new GCSE history option on migration.
Consultation Response to Green Paper, Integrated Communities Strategy

Runnymede Trust & Race on the Agenda

Question 1

We define integrated communities as communities where people - whatever their background - live, work, learn and socialise together, based on shared rights, responsibilities and opportunities. Do you agree with our definition?

As with all the consultation questions, it is difficult to disagree strongly with this definition. We have general concerns about the framing of these questions, both in terms of being good research or evidence-gathering practice, and in terms of the how framing will then inform policy development. This definition of integration is not a bad one, but it is not the one we would use. The proposed definition doesn’t fully capture the research evidence on integration, nor does it help policymakers focus on those areas that are most pressing, and that have best evidence of success. In general, the evidence suggest the government or state should focus on those areas where it has most responsibility and accountability, namely in providing equal opportunities and rights, and so tackling existing inequalities, in employment, education, health and housing.

The academic evidence (Ager and Strang, 2008) indicates there are several domains of integration beyond socio-geographical/spatial; these include socio-economic, political, cultural and interpersonal (Runnymede 2018). Labour market or employment integration is particularly significant yet it currently remains one of the biggest ‘integration gaps’ in Britain. It is unrealistic to expect new immigrants to interact or live together with settled/host communities if they continue to have worse (socio-economic) opportunities and experiences than the rest of the population. Government integration strategies should therefore encourage equal treatment by our institutions, and opportunities in school, work and politics (voting).

In addition, a cohesive society is one which is committed to combatting racism; government must show greater leadership in making the British values of equality and non-discrimination a reality by devising a comprehensive race equality strategy.

There is a growing association of integration issues with the government’s countering extremism agenda, and now Countering Extremism Commission. We are increasingly concerned about this link, not least because the evidence linking “lack of integration” (lack of integration in which dimension and who does it refer to?) to terrorism is unclear (and somewhat disputed by the security services).
Question 2

We believe that the varied nature and scale of integration challenges means that tailored local plans and interventions are needed to tackle the issues specific to particular places. Do you agree?

Again, it is difficult to disagree. We have previously (see Runnymede’s Casey Review response) strongly emphasised the importance of area-based interventions. However: first, these interventions should focus on inequality and deprivation; while, second, any local interventions cannot always overcome countervailing national trends, for example increased poverty because of budget decisions, or discrimination by employers. These will need national policy responses, not least as local government in Britain often doesn’t have the power or levers to tackle many of the sources of local or area-level deprivation and inequality.

To respond appropriately to the different barriers facing different groups, data and policy responses must be local. Geography has a large and differential impact on the life chances of BME people. For example, Manchester and Stafford have relatively equal employment rates for all groups while the Black African group face higher levels of unemployment in Liverpool and London. The Runnymede Trust’s ‘Race Equality Scorecard’ project shows that this is possible. This highlights the need for solutions that are locally tailored, often by working with community organisations who are best placed to reach those BME people & new immigrants who are marginalised and least engaged with existing services or institutions.

Tackling socioeconomic inequalities will also improve integration and social mixing. Academic evidence (Centre on Dynamics and Ethnicity, 2013 ‘Diversity or Deprivation’) shows that it is deprived areas rather than diverse areas that are generally less cohesive. Therefore integration policies should focus on areas of deprivation and poverty. However, in order for integration policies to be effective they should focus on “entire geographical communities” rather than only any one group or community.

Question 3

Do you have any examples of successful approaches to encourage integration that you wish to highlight, particularly approaches which have been subject to evaluation?

The Runnymede Trust’s Race Equality Scorecard Project has collected some of this data at local authority level in Croydon, Kingston, and Redbridge, Sutton, Barking and Dagenham, Hackney and Haringey (Khan and Catney, 2017). We worked with local authorities to map inequalities in education, employment, housing, health, criminal justice, civic participation and support for the BME voluntary sector. Government and local authorities should scale up this work to assess the needs of different groups, including white working class groups and make targeted interventions. Leicester presents a good example of how local strategies can raise attainment. After a sizeable increase in the number of Somali pupils in Leicester schools, the schools responded with specific measures. This includes positive engagement between schools and Somali parents and the
use of mentors and teaching assistants from ethnic minority backgrounds. This led to significant progress in GCSE results (OSF, 2015). Another success story is the use by some employers of positive action schemes, such as that run by the BBC. This makes it more likely that BME applicants will have the knowledge about how best to apply for roles, and reduce the very large employment inequalities in Britain. While employers are increasingly aware that over 20% of current 18-24 year olds are BME (rising to over 50% in London), very few workplaces are as diverse even at the entry level. Even among 35-44 year olds, around 20% are now BME, with around 40% of 45-54 year olds in London being BME. But there are probably no major employers with senior management teams that approximate these percentages, so it is long past time for the public and charitable sectors to follow the private sector in adopting targets, and incentivising senior managers to hit such targets, not just in hiring, but in the progression of BME staff.

**Question 4**

**Chapter 1: Strengthening Leadership**

The questions in this section relate to Chapter 1: Strengthening Leadership. The Green Paper proposes that we need to build the capacity of our leaders to promote and achieve integration outcomes. Do you agree? We are not sure what the Green Paper means by ‘our leaders’. If by leaders the Green Paper means that all ministers, senior officials, and Chief Executives of private, public and voluntary sector organisations should do more to tackle racial inequalities and promote integration, then we agree. We are less certain about supporting a smaller number of people who are solely responsible for integration.

The best ways to ensure that a focus on leadership isn’t too narrow is through foregrounding the link between leadership and institutional practice and change. There’s little point in supporting a few individuals, however inspiring and leading, if this doesn’t translate into better outcomes for everyone. In particular, we have long supported incentivising (or disincentivising) leaders to address racial inequalities. All leaders, including in the public sector, should have a Key Performance Indicator (KPI) on tackling racial inequalities, and if they do not achieve these outcomes, this should be reflected in their appraisals, as well as their pay and promotion.

Financial support to increase the capacity of leaders who are working to improve integration outcomes is welcome. Training and sharing best practice between members of the new Cohesion and Integration Network could be valuable but it is not clear from the Green Paper how these leaders will be selected or which integration outcomes will be given priority.

As discussed above, tackling socioeconomic inequalities improves integration and increases social mixing. In addition, local policy responses are needed in the face of local integration challenges. It is essential that support for capacity building is available across the country and across all integration outcomes. A focus on those leading on initiatives to challenge socioeconomic inequalities would be welcome.
Chapter 2: Supporting New Migrants and Resident Communities
The questions in this section relate to Chapter 2: Supporting New Migrants and Resident Communities.

Question 5

The Green Paper proposes measures to support recent migrants so that they have the information they need to integrate into society and understand British values and their rights and responsibilities. Do you agree with this approach?

While we support this idea, we are again concerned about how this consultation has framed the question. We support the provision of more and better information for migrants, but we disagree with the idea that migrants do not understand British values or rights, or indeed that the British state (especially the Home Office in its immigration policies) has in fact always affirmed those rights. For many migrants, their interaction with the Home Office is not one that could be reasonably described as being driven by a commitment to British values, rights and responsibilities. Our concern with the proposed approach is that it doesn’t seem to recognise the actual experience of migrants (and their children), nor how current immigration, economic and social policy is undermining those values, nor indeed whether the British-born majority is as committed to such values as are migrants who choose to live here.

Migrants and their British-born children and grandchildren have faced hostility, resentment and discrimination since the arrival of Empire Windrush in 1948 seventy years ago this June. This prevents them from taking part in political, social and economic life on an equal footing.

We of course recognise that significant strides have been made. Black and minority ethnic (BME) communities and anti-racism campaigners worked to improve access to jobs and for antidiscrimination legislation and political representation. The current generation faces less overt racism than their parents and grandparents did and there is a growing number of successful BME individuals in almost all areas of British life. But racism, discrimination and inequalities still remain.

In addition, immigration policies can significantly undermine the integration of new migrants as well as existing settled British ethnic minorities, as we have recently witnessed through the Windrush scandal. Immigration policies (e.g. Immigration Acts 2014 and 2016) combined with ‘mistakes’ by the Home Office actions (e.g. deportation letters to EU migrants) have created ‘hostile environments’ for migrants through removing legal aid, appeal rights for immigration decisions; increasing citizenship and court fees; and impeding access to healthcare and private accommodation. These policies have not only created ‘hostile environments’ for ‘undocumented’ migrants (the official target of the policies), but have also stigmatised documented EU and British ethnic minority citizens who have been treated with prejudice and suspicion by police officers, doctors and landlords, and completely unwitting victims of a blunt policy tool. Fifty years on from the 1968 Race Relations Act that finally made the ‘no dogs, no Blacks no Irish’ signs illegal, it is disappointing that the government is making it rational for landlords to discriminate on grounds of race. If policymakers could imagine how the average migrant experiences
Home Office decision making and the consequences of official government statements, they might be more cautious in suggesting it is migrants who need to learn more about British values of fair play, tolerance and the rule of law.

Related to this is the broader, but significant issue around high levels of anti-immigration sentiment amongst the British public, which has improved somewhat in the last few years, but is still significantly high and based on myths and misperceptions. The government must do more to address these myths and (misplaced) anxieties about immigrants, including reviewing and abandoning ‘compliant environment’ policies. But if it is committed to British values and integration it must go further, and positively affirm the value of immigration and the enormous contribution they have made to Britain – economically, politically, culturally and socially.

Question 6

The Controlling Migration Fund was constructed to deal with the short-term migration pressures and associated costs that local authorities can encounter. Do you think it adequately achieves this objective?

While it is a positive step for the government to re-introduce the Controlling Migration Fund (CMF) that mitigates/buffers some of the impact of new migrants on an area, there have been significant concerns from local authorities (e.g. Croydon) that the amount given to them to service the needs of unaccompanied asylum-seeking children is wholly inadequate for the number of new migrants that they have to deal with. There is also some concern that CMF’s total budget is inadequate and it places far too much emphasis on immigration enforcement and compliance rather than expanding services for new migrants so that local residents do not lose out in any way. We would prefer if this fund was conceived as an ‘impact’ ‘needs based’ or ‘demography based’ fund, rather than a ‘controlling migration’ fund. For example, in terms of the demand for school places, internal migration and birth rates are just as significant as international migration, while NHS funding should be higher where there are more people over age 65. Migration is clearly one of the most significant drivers of demographic change, but it is not the only one, and the key point is that this fund is necessary because of the impact of demographic change, not because of ‘controlling migration’.

Chapter 3: Education and Young People

The questions in this section relate to Chapter 3: Education and Young People.

Question 7

The Green Paper proposes measures to ensure that all children and young people are prepared for life in modern Britain and have the opportunity for meaningful social mixing with those from different backgrounds. Do you agree with this approach?

Education is an important domain of integration. Ethnic minority pupils have seen improved results in education since 1991. However, the headline figures conceal considerable differences among the ethnic minority groups. A new
pattern has emerged, with Gypsy, Roma, Irish Travellers pupils, and Black Caribbean and White boys on free school meals having the lowest attainment at GCSE in 2015 and 2016. Bangladeshi pupils’ attainment at GCSE has greatly improved – now surpassing the national average. And although all ethnic minorities saw an increase in degree-holders, this disguises further inequality (EHRC, 2015). Only 6% of Black school leavers attended a Russell Group university, compared to 11% of White school leavers. At Oxford, no (0%) of black graduates got a first, compared to one-third of white graduates; conversely, while 0.2% of white graduates got a third, 8% of black graduates did.

In Bristol, Black African young people are the most likely to have no qualifications. As recommended in question 2, local solutions are needed to respond to these regional variations in results.

In addition, there are many more places where “meaningful social mixing” happens than assumed/discussed in the Green Paper. Workplaces, schools, universities, libraries, children’s centres, places of worship are all important places of interaction between young and old and across different ethnic groups. More importantly, these additional places are more likely to be “meaningful” and sustainable interactions because they are everyday places of integration. The workplace is especially valuable, not only because it provides people with a sense of dignity, puts food on the table for their family, and allows parents to invest in and plan for their children’s future in Britain, but because it is one of the few places where people from different backgrounds work together towards common goals.

Local organisations, including charities are also often better placed to encourage interpersonal mixing and should be supported to do so. Research shows that positive interactions with ethnic minorities at work improves attitudes towards ethnic minority groups. Negative contact with ethnic minorities at work has the opposite effect, although the impact is much less severe than having a negative experience in one’s neighbourhood (Laurence et al, 2017).

**Question 8**

**The Green Paper sets out proposals to support parents with their choice of out-of-school education settings. Do you agree with this approach?**

As noted in the Green Paper, out-of-school settings can provide be a great opportunity to supplement learning in a traditional setting. Ensuring these environments are safe and meet their requirements under the law is paramount. However, government must be mindful that interventions are based on evidence and that some types of supplementary support are not targeted more than others unduly. We look forward to the results of the out-of-school settings proposals consultation in due course.

The focus should be on whether and how out-of-school contributes to good outcomes, including not just attainment, but how children learn extra-curricular knowledge (e.g. foreign languages such as Arabic, Chinese or Hebrew), and develop a positive sense of their own identity and worth. It’s worth recalling that many supplementary schools were started by Black Caribbean parents.
who felt that schools were fundamentally letting their children down, and in response to the very high rates of school exclusions and stereotyping. At the same time, we do have concerns where out-of-school education can increase inequalities, and can be a barrier to integration. Overall the guidance on out-of-school education should foreground concerns around racial (and gender and other) inequalities, in terms of both attainment but also self-worth, personal identity, confidence and aspirations.

**Chapter 4: Boosting English Language**
The questions in this section relate to Chapter 4: Boosting English Language.

**Question 9**
*(a)* The Green Paper proposes a number of measures to improve the offer for people to learn English. Do you agree with this approach?

We welcome the government’s interest in and commitment to this area. The importance of English language proficiency to successful integration is widely acknowledged (see Haque 2010 ‘What works with Integrating New Migrants? DCLG). English language skills facilitate integration in the job market and in education. It aids access to services and enables social mixing. Unsurprisingly, migrants themselves are typically the strongest advocates for English language training, both to help them navigate education and health services for their family, and to get better jobs. Practically speaking, nearly all migrants would seek to improve their English language skills given the enormous personal and social benefits this confers. Adequate funding for English classes is therefore essential. However, these must be targeted and accessible to the groups that need them.

Sometimes the government has somewhat exaggerated the scale of this issue. Very few people (138,000) speak no English at all, and it’s not correct to say, as the Communities Secretary did, that ‘most’ of these people are women from Bangladeshi and Pakistani backgrounds (it’s actually less than one in four). Among those under 45, very few don’t speak English or speak it well, and while it is of course good to increase English proficiency among older Bangladeshi and Pakistani women, this is unlikely to result in major labour market gains. Furthermore, this narrow focus on Bangladeshi and Pakistani women distracts and may lead to poor policy development for other groups with high English language needs, in particular refugees.

Not all BME communities are in need of English language classes. There are substantial differences between different age groups, new arrivals and settled communities. As a result, English language classes must reflect local needs and serve their communities accordingly. The Runnymede Trust and Women’s Budget Group *Intersecting Inequalities* report found that lack of childcare facilities and the cost of travel prevented BME women on lower incomes from attending classes (WBG/Runnymede, 2017). Between 2008 and 2015, English as a Second Language (ESOL) funding from government fell by 50% (TES, 2016). Funding was made available for ‘women in isolated communities’ but research by Refugee Action noted that waiting lists of over 6 months are commonplace (Refugee Action, 2017).10

We’re also concerned that the government has not adequately funded this area given that the whole integration strategy has only been given £50m funding, when £132million has been removed from ESOL alone between 2010 and 2015.

(b) Do you have any other suggestions on how we can improve the offer for people to learn English?
To be effective, provision should be flexible, account for childcare needs and shift work to ensure it is accessible. A mix of community-based classes delivered by Third sector organisations and structured courses at colleges should be funded to meet the needs of different communities. Facilitating relationships with other services – libraries, children centres, JobCentre Pluses, faith venues and workplaces to offer classes can help to make them more accessible (Good Things Foundation, 2017).
The Home Office funded ESOL regional mapping exercise should be expanded. Part of the Syrian Resettlement Programme, 12 regional coordinators mapped language demand and support. If the provision was not adequate, they supported the development of further classes. This scheme should be expanded to include other migrant groups and settled communities with language needs. It should also be extended beyond the six-month timeframe, to allow coordinators to create local ESOL action plans and implement them (NRDC, 2011). Funding from central government should be targeted in line with need as part of a national strategy for English language.

Chapter 5: Places and Community
The questions in this section relate to Chapter 5: Places and Community.

Question 10
The Green Paper proposes measures to ensure that people, particularly those living in residentially segregated communities, have opportunities to come together with people from different backgrounds and play a part in civic life. Do you agree with this approach?
The discussion about “residential segregated communities” is relatively unbalanced, with more emphasis (and burden) on ethnic minority communities to ‘integrate’ versus their white counterparts. White British people are in fact least likely to know someone of a different ethnic background, to be in a relationship with someone of a different background, or to believe that cultural diversity is a good thing.
A good example of the failure to reflect the evidence is the discussion on segregation, where the problem of ‘segregation’ in not only misrepresented, but is also measured in terms of ‘all ethnic minorities’ versus ‘white British’ community. This means that ‘ethnic diversity’ (which can include several ethnic minority communities) is automatically viewed as an integration ‘problem’ rather than a positive integration development. Ethnic minorities are lumped into one group and an area with a low White British population is then assumed to be ‘isolated’ or ‘segregated’ (Catney, 2015; Khan, 2016).
The discussions on segregation also overlooks the fact that on average, ethnic minority groups live in local authority areas where their ethnic group amounts to less than 10% of the total area population, compared to White
British populations, who live in areas where they are 85% of the population. In addition, ethnic minority concentration (another proxy for segregated groups) is measured on a Ward level basis, which on average comprise around 7500 people. This is deceiving because analysis of Census data since 2001 shows that the spread of ethnic minority groups has actually increased rather than decreased.

Residential integration has increased between 1991 and 2011 for the majority of groups. Large cities such as Leicester, Birmingham, Manchester and Bradford have seen a decrease in segregation for most ethnic groups. At ward level, ethnic groups do live in greater concentrations. Even so, there are only 16 wards out of 8500 where one ethnic minority group makes up more than 50% of the population. Government should look at how low incomes, housing inequality and fear of racism interact to limit residential choices for BME people.

Some of government’s policies in other areas (e.g. welfare and public sector cuts) are actually undermining integration by reducing the number and types of neutral places where people can come together. This includes libraries, children centres, parks, youth services and clubs – which historically represented places where different groups could come together for shared purposes, but have significantly reduced in number because of public sector cuts. It’s important to ask what this reduction of public spaces means with regards to integration, and whether it’s an area/opportunity that third sector organisations could explore more in terms of substitutes for services & spaces lost.

Chapter 6: Increasing Economic Opportunity

The questions in this section relate to Chapter 6: Increasing Economic Opportunity.

Question 11

The Green Paper proposes measures to provide tailored support to people, especially those who may not currently be active in the labour market, to build their confidence and skills to take up employment. Do you agree with this approach?

Employment is essential to successful integration. It is the most important policy lever (Haque, 2010) and government should urgently adopt specific interventions to address ethnic inequalities in the workforce.

Despite improvements in education, inequality persists in the job market for BME people. This has been well documented and cuts across many areas of the labour market and the country. BME workers are more likely to be overqualified for their role, be in low-paid work and to live in poverty than White British workers (Catney & Sabater, 2015). A recent BBC trial found that a CV with an English-sounding name received three times as many interviews than the applicant with a Muslim-sounding one. This supports previous government-sponsored research that shows that equally qualified candidates with African or Asian-sounding names need to send twice as many CVs just to get an interview.

There remains an 11 percentage point employment gap between the White British and BME population. According to government figures BME youth unemployment has been growing year on year, increasing 49% between 2010
and 2015. Furthermore, Black graduates earn on average 23% less than their White peers. Black and Asian workers are also more likely to be in insecure, part time employment and agency work.

Labour market disadvantage pervasive across the country, with Black, Asian and Mixed groups aged over 25 facing disadvantage in the labour market in 75% of all Local Authorities. Ending discrimination and unconscious bias in the workplace is key to securing a fair deal for ethnic minority workers. Government should implement the recommendations in the McGregor-Smith Review, Taylor Review and Parker Review. Economic opportunity and empowerment – including progression at work – is crucial to ensuring successful integration for established communities and new arrivals. Discrimination and stereotyping in schools must also be tackled to improve the performance of ethnic minority pupils in both schools and the labour market. For Black Caribbean and Mixed White/Black Caribbean children in England, the permanent exclusion rate is three times higher than it is for White British pupils (EHRC, 2015). Equally, Gypsy, Roma and Irish Traveller pupils have the highest permanent exclusion rate. ‘Illegal’ or informal exclusions of pupils is estimated to also disproportionately impact these groups. Evidence has shown that unconscious bias and racist stereotypes affect teachers’ perceptions of children’s behaviour and the punishments they receive. Support and training for teachers, as for all public servants, is needed to challenge unconscious perceptions.

Chapter 7: Rights and Freedoms
The questions in this section relate to Chapter 7: Rights and Freedoms.

Question 12

The Green Paper proposes measures to encourage integration and resist divisive views or actions. Do you agree with this approach?

We agree with the need to combat divisive, and especially racist views and actions. The government should strengthen the EHRC’s ‘good relations duty’ and take a tougher approach to prosecuting racial discrimination, and also ensure more people can afford to bring forward claims of discrimination at work. Furthermore, the government should show more leadership in speaking up against racism wherever it appears and whatever forms it takes. But generally, the policy focus should be on the outcomes and actions rather than racist attitudes or beliefs.

The government has given prominence to ‘British Values’ as a necessary thread to bind and unite us. We agree that equality, human rights and the rule of law should be more prominent in public discourse and policymaking. However it is not presently obvious that government is tackling the greatest gender or race equality gaps in Britain, nor that it is fully committed to human rights. Instead we see British values invoked in a somewhat haphazard way, unrelated to the greatest threats to those values (e.g. by Ofsted with the “hijab ban” or the integration benefit of taking oaths). There are also implicit suggestions that British ethnic minorities, including Muslim groups, have not signed up to these British values. This is despite the citizenship survey, the Census and other surveys consistently showing that ethnic minorities not only feel strongly affiliated to Britain, but in many cases, their affiliations are stronger than white British groups.
More importantly, research by the Dr Lindsay Richards and Professor Anthony Heath reveals that socioeconomic status is the best predictor of support of tolerance, equality and the rule of law. Higher income and education levels correlate with stronger support for these values. And once you adjust for these differences all ethnic groups expressed a similar level of support. To ensure successful integration for all, closing the gap in education and employment outcomes between ethnic minorities and the White majority population is essential.

Equally, we must challenge racist attitudes beliefs that are still pervasive throughout Britain. Work by the Runnymede Trust and NatCen (2017) made this clear: the proportion of respondents to the British Social Attitudes Survey that self-describe as ‘very’ or ‘a little’ prejudiced towards people of other races has never fallen below 25% since 1983. Attitudes to abortion and homosexuality have become more liberal, but racial prejudice refuses to go away. This has real life consequences in school and the workplace - data from the European Social Survey found that almost 1 in 5 Brits agree that ‘some races or ethnic groups are born less intelligent’; 44% said that some are naturally harder working. A cohesive society is untenable unless we are all committed to combatting racist views. Government should devise a comprehensive Race Equality strategy with a strong commitment to antiracism and ending discrimination.

There are also wider questions about how far institutions, and government policies, have increased rather than decreased discriminatory attitudes. Research has shown that those who fall victim to institutional racism are half as likely to feel connected to Britain (Centre for Dynamics of Ethnicity, Manchester 2013). A Black man is still five times more likely to be stopped and searched by police than a White man in England and Wales. Furthermore, the ‘Prevent’ strategy has led some Muslim groups to feel they are being treated unfairly, stereotyped and socially excluded. These factors have consequences not simply for those directly affected, but for those witnessing ethnic profiling, whether peers, teachers, parents, coaches, judges, employers or prison officers. For our society to be united around “shared cultural values”, our institutions must work for everyone.

**Question 13**

The Green Paper proposes measures to address practices which can impact on the rights of women. Do you agree with this approach?

We are strongly committed to gender equality. The pay gap, and lack of access to sexual health and domestic violence services are major injustices in Britain today, as are the gendered ways our children are educated in schools. Furthermore, many gender inequalities affect BME particularly, whether in terms of the consequences of budget decision-making, or forced marriage and FGM.

However we don’t feel the Green Paper necessarily focuses on the most significant gender inequality issues, sets out clear strategies that will improve the outcomes of BME women or outline the ways it will ensure their voices influence policymaking. There is a somewhat disproportionate focus on Muslim women – and particularly on their economic inactivity, English language skills and ‘evidence’ that Muslim women may be constrained in both
these areas because of ‘cultural practices’. The evidence cited is very patchy. For example we know whether the lack of English fluency amongst this particular cohort of women is linked to their ‘economic inactivity’. It’s also unclear why the focus is on ‘economic inactivity’ rather than unemployment which would arguably highlight more problematic barriers to employment (see APPG report). Or underemployment? Is economic ‘inactivity’ an appropriate priority? It affects many people but harmful integration consequences are less obvious.

The government must also consider carefully how its existing policies are undermining the integration of women generally. For example, consecutive government Budgets and benefit changes have disadvantaged women the most, and hit the poorest BME women the hardest.

Finally, it’s important for government to review what the closure of race equality organisations means for ethnic minority women. Specialist services for ethnic minority communities have shrunk considerably under austerity measures, with little evidence that these have been absorbed into the mainstream. There are therefore some serious questions as to who now identifies and targets services for vulnerable migrant women, particularly those who may have insecure legal status and have been trafficked. With regards to women we have serious concerns about how the integration agenda and Modern Slavery policies have been significantly undermined by the governments’ hostile environment policies.

Chapter 8: Measuring Success
The questions in this section relate to Chapter 8: Measuring Success

Question 14
The Green Paper proposes core integration measures for national and local government to focus on. Do you agree these are the right measures?

As mentioned at the beginning of this consultation response, integration needs to cover several dimensions including social and cultural. For this reason the measures proposed are not sufficient.

Political integration is one of the key areas. The government should close the voter registration gap between white British and BME voters. All ethnic minority groups are at least two times as likely not to be registered, with black groups four times less likely. Given extensive racial inequalities of opportunity, and rising diversity among young voters, these differential participation rates are an unhealthy sign for British democracy and a serious barrier to integration.

Those who experience racism are half as likely to feel connected to Britain. The Equality Act 2010 must therefore be properly implemented, with strengthening of the infrastructure to ensure compliance with the law. Furthermore, the Equality Duty should be strengthened so that policymakers don’t simply note the unequal effects of policies, but are required to suggest mitigating measures to ensure existing racial inequalities aren’t further worsened by government policy.

Many racial inequalities are linked to poverty or to socioeconomic inequalities in Britain. The socioeconomic duty in the Equality Act 2010 should come into force, which will benefit all working class people. The Equality Act 2010
should also be amended to enable cases of multiple discrimination to be recognised. Another way to improve integration is to strengthen and extend the Equality and Human Rights Commission’s ‘good relations duty’ which requires those subject to the equality duty (namely public bodies) to promote good relations between people of different protected characteristics, including different ethnic groups.

We cannot build a cohesive society where racism and discrimination continue to affect peoples’ opportunities, and how citizens interact with one another. Government should devise a comprehensive Race Equality strategy with a strong commitment to antiracism and tackling discrimination. The best way to do this is to link the government’s response to the Race Equality Audit, which provides extensive evidence on racial inequalities in public services, to its integration strategy.

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