

# Response on Government Statistical Service Harmonisation consultation on user needs for additional response options in a future ethnicity standard

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I am submitting this consultation response as an expert in community development and fairness with over 12 years of experience across the UK public and voluntary sectors, and as a PhD student at Bournemouth University researching the representation of Eastern European identities in UK public policy. The research is structured as a case study, analysing the representation of Romanian and Polish identities and a comparison between Birmingham and London policy. In my response, I also draw on the experience working with grassroots community organisations, second-tier strategic voluntary sector groups, and the local government. Having worked with stakeholders such as the NHS, the Gangmaster and Labour Abuse Authority, the Home Office, various embassies and consulates, as well as the European Union Delegation to the UK, I am able to provide a comprehensive response which reflects on the diverse implications of ethnicity data in policy making. The response refers to England, Wales, Scotland, and Northern Ireland.

The consultation is a welcomed step towards providing more clarity and support to communities and policy makers in order to help advance equity and promote inclusion. My preliminary findings indicate that, mainly since Brexit, Eastern European communities have become more visible in public policy environments which widely used 'White Other'<sup>1</sup> as an umbrella ethnic category when referring to those identifying as non-British Whites, including Eastern Europeans. This is an oversimplified approach as also shown in scholarship<sup>2,3,4</sup> and linked to racism and colonial power hierarchies. Pre and post Brexit, these identities' usage in public policy adversely impacted these groups<sup>5</sup> and fuel the East/West divide potentially jeopardising democracy as we know it today<sup>6</sup>.

Drawing on my experience and expertise, as well as my multidisciplinary research on how various identities are engaged, I recommend more robust data collection on ethnicity and categorisations. These will address the ambiguities faced by the communities traditionally referred to as Eastern European.

## 1. The ambiguity of data:

Case study 1: The statistical data on Romanians living in England:

ONS 2021 Census data main language Romanian: 539,000<sup>7</sup>

ONS 2021 Census data passport held (Romanian): 367,763

EU Settlement Scheme (EUSS) applications from Romanian passport holders (UK), September 2025: 1,729,595<sup>8</sup>

The above data comparison illustrates the significant data gaps influenced mainly by the data collection methods – self-declaratory (Census) versus mandatory confirmation of nationality through proof of citizenship (EUSS), the latter with right to work implications.

Case study 2: Local Authority ethnic categorization in Birmingham

This example reflects on how local authorities present the demographic data and the implications of missing large population groups from any data sets, with direct and significant consequences on resource allocation, participation, cohesion, and representation.

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<sup>1</sup> Garlick, S. (2022, November 29). *Ethnic group, England and Wales - Office for National Statistics*. <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/bulletins/ethnicgroupenglandandwales/census2021>

<sup>2</sup> Kalmar, I. (2023). White But Not Quite: Central Europe's Illiberal Revolt: A Rejoinder. *Cultural Sociology*, 18(3), 431-438. <https://doi.org/10.1177/17499755231206291> (Original work published 2024)

<sup>3</sup> Balogun, B. (2023). 'Eastern Europeanism': A Rethinking of 'Race and Racism' by and Against White People from Central and Eastern Europe. *Cultural Sociology*, 18(3), 411-415. <https://doi.org/10.1177/17499755231208550> (Original work published 2024)

<sup>4</sup> Turda, M. (2023). Eugenics and the Racialisation of 'White Eastern Europeans'. *Cultural Sociology*, 18(3), 424-427. <https://doi.org/10.1177/17499755231214595> (Original work published 2024)

<sup>5</sup> Lewicki, A. (2023). East-west inequalities and the ambiguous racialisation of 'Eastern Europeans.' *Journal of Ethnic and Migration Studies*, 49(6), 1481-1499. <https://doi.org/10.1080/1369183X.2022.2154910>

<sup>6</sup> Epstein, R. A., & Jacoby, W. (2014). Eastern enlargement ten years on: Transcending the East-West divide?. *JCMS: Journal of Common Market Studies*, 52(1), 1-16. <https://doi.org/10.1111/jcms.12089> Digital Object Identifier (DOI)

<sup>7</sup> Office for National Statistics (2025), Romanian nationals in the United Kingdom, Available at: <https://www.ons.gov.uk/aboutus/transparencyandgovernance/freedomofinformationfoi/romaniannationalsintheunitedkingdom> (Accessed on 4 February 2026)

<sup>8</sup> Gov.UK (2025), Immigration System Statistics Data Tables, Available at: <https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables> (Accessed on 4 February 2026)

A report from 2020 from Birmingham City Council reviewed their workforce profile<sup>9</sup> and provided information on the ethnic categories used for this. Notably, the umbrella ethnic category “White” has been used to include identities such as British, Albanian, Gypsy or Irish Traveler, Irish, and White Other despite evidence of deep inequalities experienced by the minorities grouped in this case alongside White British, with research from the Local Government Association and Solace in 2023<sup>10</sup> demonstrating the lack of ethnic diversity in senior local government roles. Moreover, key Eastern European groups are not mentioned at all, and no distinction is made between ethnicities grouped under the “White” category. Contradicting existing evidence, this report demonstrates that misrepresentation of ethnicities and conflating categories of groups, nationalities, and cultures that are significantly different, places population groups at risk of marginalisation.

In a second instance, also regarding Birmingham City Council, communities traditionally referred to as being Eastern European are simply not mentioned at all. The Birmingham City Council population profile report based on the ONS 2021 Census data<sup>11</sup> groups most European communities under Other EU Countries without any mention of Eastern Europeans by nationality, ethnicity, language spoken or passport held despite the ONS data showing that Romanian and Polish are the most common foreign languages in Birmingham and the EU Settlement Scheme data showing that more than 75,000 applications have been received from Romanian and Polish nationals.

## 2. The identity struggles of people from Eastern Europe

Scholars researching Eastern European identities employ significantly diverse geographical definitions of the Eastern European space in their analysis with reference to (1) Eastern European EU member states and accession to the EU<sup>12,13</sup>, (2) Eastern bloc<sup>14</sup> while legislators (thus policy terminology) refer to a mix of (3) EU/EAA and non-EU/EEA member states as Eastern European countries<sup>15</sup>.

Eastern Europeans have been traditionally referred to as White Other – an umbrella category in policy making for all White non-British ethnicities<sup>16</sup>. The multi-layered Eastern European identities thus remain masked and “unseen”. Policy makers risk conflicting their duties under the Equality Act 2010<sup>17</sup> by excluding significant groups and vulnerable people in their provisions.

Post-Brexit community developments produced important debates and activism demanding recognition and inclusion in public policy. Specifically, Polish nationals organised a petition<sup>18</sup> to further the UK public policy recognition of the Polish identity separate from those of Eastern Europeans or White Other.

Another important layer to this debate stems from the fact that migration is not a protected characteristic under the Equality Act 2010<sup>19</sup> which puts White Minorities at risk of becoming invisible in policy making due to assumptions (as per case above of Birmingham City Council 2020 Workforce Diversity Report) that all White groups benefit from the same advantages. Evidence shows that people from Eastern Europe face significant inequalities in the UK. A large proportion of Eastern European are earning less than other European citizens in the UK, hold fewer senior roles, and are mostly overqualified for the jobs they hold<sup>20</sup>. Scholars such as Kalmar and Balogun wrote extensively on the racialisation of Eastern Europeans in Western Europe and evidenced peripheral whiteness “constituted simultaneously by both privilege and deficit”<sup>21</sup>, thus becoming an inter-ethnic class system, placing Eastern Europeans both at the margins and at the core of social conflicts (e.g. recent ethno-nationalistic movements in England engaged a favourable outlook on

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<sup>9</sup> Birmingham City Council (2021), BCC Workforce Race Equality Review, Available at: [https://www.birmingham.gov.uk/downloads/file/18302/bcc\\_workforce\\_race\\_equality\\_review%20](https://www.birmingham.gov.uk/downloads/file/18302/bcc_workforce_race_equality_review%20) (Accessed on: 4 February 2026)

<sup>10</sup> Solace (2023) Understanding and improving Equality, Diversity, and Inclusion in the local government workforce across the UK, 2023. <https://8018031.fs1.hubspotusercontent-na1.net/hubfs/8018031/Campaigns/Summit%2023/Solace%20EDI%20Final%20Report.pdf>

<sup>11</sup> Birmingham City Council (2022), City Observatory: Analysis of Census 2021 Data, Available at: <https://cityobservatory.birmingham.gov.uk/p/analysis-of-census-2021-data/> (Accessed on 4 February 2026)

<sup>12</sup> Bueltmann, T., & Bulat, A. (2021). *EU Citizens' Identity, Belonging & Representation Post-Brexit: Full Report*. University of Strathclyde.

<sup>13</sup> Kalmar, I. (2023). White But Not Quite: Central Europe's Illiberal Revolt: A Rejoinder. *Cultural Sociology*, 18(3), 431-438. <https://doi.org/10.1177/17499755231206291> (Original work published 2024)

<sup>14</sup> Bonnett, A. (2002). Communists like us: Ethnicized modernity and the idea of 'the West' in the Soviet Union: Ethnicized modernity and the idea of 'the West' in the Soviet Union. *Ethnicities*, 2(4), 435-467. <https://doi.org/10.1177/14687968020020040101> (Original work published 2002)

<sup>15</sup> International Criminal Court (2024), Eastern Europe States, Available at: <https://asp.icc-cpi.int/states-parties/eastern-european-states> (Accessed on: 4 February 2026).

<sup>16</sup> Department for Business, Energy & Industrial Strategy (2018), Ethnicity Pay Reporting: Government Consultation, Available at: <https://assets.publishing.service.gov.uk/media/5bbf193fe5274a36357d50ec/ethnicity-pay-reporting-consultation.pdf> (Accessed on 31 January 2024).

<sup>17</sup> Gov.UK (2023), Equality Hub: Public Sector Equality Duty: Guidance for local authorities, Available at: <https://www.gov.uk/government/publications/public-sector-equality-duty-guidance-for-public-authorities/public-sector-equality-duty-guidance-for-public-authorities> (Accessed on: 4 February 2026).

<sup>18</sup> Mackell, A. (2024), Making Polish Families visible in data collection, Available at: <https://www.change.org/p/make-polish-families-visible-in-data-collection> (Accessed on: 4 February 2026).

<sup>19</sup> Tross, D., Maglan, A. (2025). Migrant Representation in UK Local Government Workforces: Advancing Justice and Participation for Equitable Governance. Research Report. <https://www.socialequity.org.uk/research>

<sup>20</sup> Clark, K. et al. (2018) 'Local deprivation and the labour market integration of new migrants to England', *Journal of Ethnic and Migration Studies*, 45(17), pp. 3260–3282. doi: 10.1080/1369183X.2018.1481000.

<sup>21</sup> Blachnicka-Ciacek, D., & Urbańska, S. (2025). Eastern Europe's 'peripheral whiteness': class and gender racialization among Polish migrants and returnees. *Identities*, 1–20. <https://doi.org/10.1080/1070289X.2025.2510776>

Eastern Europeans due to them being accepted as “White & Christian”). This demonstrates the multi-faceted and complex identity struggles of Eastern Europeans, subject to a constant negotiation process in relation to their identity and belonging, with consequences on social cohesion and conflict, belonging, the economy, and many other areas in the society.

### 3. Recommendations

In conclusion, Eastern European communities engage a spectrum of identities that can influence data collection. Thus, the Census processes can ensure that:

a. the survey questions specifically offer options for people to respond with their preferred identity, while also aggregating various data categories to obtain accurate representations of their profiles. For example, cross-referencing information such as ethnicity, passport held, nationality, and main language can offer a clearer picture of the respondent’s identity as it is inclusive of those who may have naturalized as British or that assume they are British.

b. policy makers receive clear and concrete guidance on proportional, fair, and representative use of ethnicity categories in their localised interpretation and applicability of the Census data. Accountability for exclusions and obscuring of certain groups and communities must be defined and audited.

c. community organisations must be informed of the available avenues for challenging data producers and policy makers, upskilling them on (1) any protections such as removing smaller groups due to risks; (2) the mechanism of how the demographic reports are being produced; and (3) the specific duties of policy makers and those publishing the data on accuracy and proportionality, as well as their legal duties under the Equality Act 2010 for fairness and inclusion of all communities.

Thank you and I confirm that I am available for a further and more detailed contribution if needed. I consent with my name being published if needed.

Sincerely,

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