

Equality Evidence Strategy 2023-25 consultation

Coalition for Racial Equality and Rights

October 2022

This submission, originally provided via the Citizen Space public engagement platform, sets out CRER's response to a [Scottish Government consultation on its Equality Evidence Strategy 2023-25](#).

This new strategy is intended to enable policy makers to develop sound and inclusive policies to improve service delivery and outcomes for people in Scotland.

Section 1: Vision

1.1 Do you think the Scottish Government should revise the vision developed in 2017?

Yes

1.2 If you answered "Yes" to Question 1.1, please set out how the Scottish Government should revise the vision:

It is not sufficient for the equality evidence base to be 'more wide ranging'. To ensure that policy design and implementation works to reduce inequalities and barriers and to meet needs, comprehensive equality data needs to be available.

The term 'enabling' is also arguably not strong enough. "Ensuring that national and local policy makers develop..." would send a message that using equality data is not an optional extra, but an intrinsic part of the policy cycle.

Section 2: Proposed actions

2.1 To what extent do you think that the proposed actions would adequately deliver on our ambition for a robust and wide-ranging equality evidence base?

Partially

2.2 Please set out the reasons for your answer to Question 2.1:

Whilst the actions may significantly improve the data available in some areas, equality data improvement needs to happen across the board in Scottish Government. The approach taken here is not particularly strategic, focussing largely on welcome practical improvements, but lacking a focus on how statistics can be better used.

We note that the datasets linked to from the consultation paper could not all be opened. We were therefore not able to adequately assess the presently available information. In all cases, we would want to see the publication of ethnicity data at as granular as possible a level, utilising weighting and/or pooling where needed to enable this, and ideally cross-tabulated to provide intersectional data as suggested within the consultation paper. We also welcome proposals to improve the completeness of ethnicity data where required. Where appropriate, greater use should be made of adding booster samples of BME respondents to ensure that all data sets can be properly disaggregated by ethnicity.

3.1 From your perspective, what are the most important actions outlined in the draft improvement plan?

Action 5, Action 13, Action 16, Action 18, Action 19, Action 28

3.2 Please set out your reasons for your answer to Question 3.1:

I feel this way because:

We have selected the actions of arguably greatest relevance to racial inequalities, however the majority of the areas of action are of interest to our work.

4.1 Are there any proposed actions that you think should be revised?

Yes

4.2 If you answered "Yes" to Question 4.1, please tell us which action(s) you think should be revised and how:

The content of the actions themselves is sound, however additional, more strategic commitments would be welcomed.

Section 2 Proposed actions

5.1 Are there any additional improvement actions that you think should be considered that are achievable within the 2023-25 time period?

Yes

5.2 If you answered "Yes" to Question 5.1, please tell us what additional improvement actions we should consider, and the reasons why these actions are important:

Additional work to ensure appropriate use of equality data in policy making and progress reporting, improving the utility of Equality Evidence Finder, working with analysts across Scottish Government to ensure that each Directorate's analytical function is working to improve the availability of high quality equality data rather than focusing on a few narrow areas as outlined within the strategy (which reads more like a brief action plan than a two-year strategy).

Investment in this area will have significant benefits, including potentially cost-saving benefits over time as policies will better meet the needs of people with protected characteristics, reducing the need for additional interventions to tackle inequalities.

Whilst improved equality data collection and analysis may be challenging, we certainly should not go backwards with the data that we currently have – for example, we recent changes by Scottish Government in who is included in the measurement of poverty within the minority ethnic families priority group to now also include white minorities is a retrograde step (partly because poverty levels of white minority groups are generally lower than (non-white) BME groups and combining the categories skews the results and could skew the priorities for tackling poverty.

6.1 Would you or your organisation like to collaborate with the Scottish Government on any of the proposed actions?

Yes

6.2 If you answered "Yes" to Question 6.1, please tell us which action(s) you would like to collaborate with the Scottish Government on and how:

All actions relating to improving ethnicity data would potentially be of relevance to our work, and we would be pleased to discuss how we could usefully input to any of these. We have previously provided Scottish Government with a list of data sources we are aware of which were missing from Equality Evidence Finder, so this is another area in which we could collaborate.

Adding voluntary sector groups such as CRER (who use data extensively in their work) on to the Project Board would be an easy means of enhancing collaboration.

(Question 7 not answered)

Section 3: Use of equality evidence

8.1 How often do you or your organisation use equality evidence?

Often

8.2 If you answered "Often", "Occasionally" or "Rarely" to Question 8.1, please tell us which equality evidence sources you or your organisation use:

A wide range of Scottish Government datasets, particularly in areas such as education, socio-economic deprivation, criminal justice etc. In particular we use:

- Scottish Household Survey
- Scottish Crime and Justice Survey
- Social Security Scotland statistics
- Scottish Social Attitudes Survey
- Homelessness in Scotland statistics
- Census outputs
- Pupil Census, Teacher Census and other education statistics

8.3 If you answered "Often", "Occasionally" or "Rarely" to Question 8.1, please tell us how you or your organisation use equality evidence:

To evidence racial inequalities and the progress, or lack of progress, in these. We use an extensive amount of data both within our policy work (responding

to consultations, supporting policy development with Scottish Government and other public sector partners) and within our campaigns and public education work (writing research reports, delivering capacity building activity).

8.4 If you answered "Often", "Occasionally" or "Rarely" to Question 8.1, please tell us how you or your organisation usually access equality evidence:

Mainly through online datasets.

9.1 Do you face any barriers to using equality evidence?

Yes

9.2 If you answered "Yes" to Question 9.1, please tell us about the barriers you have faced in accessing the equality evidence you need:

The actual lack of race equality data is the key barrier.

Additionally, even where data exists / is collected, there is not enough evidence disaggregated by granular ethnicity categories. For example, we highlighted in our 2020 research report 'Scotland's National Performance Framework: Measuring outcomes for minority ethnic communities':

- Five National Outcomes had no indicators with ethnicity data on Equality Evidence Finder. Two of these outcomes are key areas with known inequalities for BME groups (poverty and health), where an up-to-date evidence base is absolutely crucial to drive progress
- 65% of National Indicators (26 out of 40) did not have ethnicity data on Equality Evidence Finder. For the vast majority of these indicators, the provision of ethnicity data could reasonably be expected
- Some of the data on Equality Evidence Finder was of poor quality, for example not up-to-date or without an explanation of ethnicity categories used
- Data on Equality Evidence Finder was generally not disaggregated by individual ethnic group, meaning that differences in outcome for the wider range of BME groups cannot be accurately measured or addressed

10.1 Are there any decisions you are unable to make because of a lack of equality evidence?

Yes

10.2 If you answered "Yes" to Question 10.1, please tell us which questions you are unable to answer and why those questions are important to answer:

Where there is no equality evidence available, it is difficult for us to make robust policy interventions. However, we note that even where we are able to provide this, it is not always taken on board or used. We believe the Equality Evidence Strategy needs to have significantly more focus on ensuring that data is not only published, but used effectively in policy making and progress reporting.

Section 4: Equality evidence collection

11.1 Do you or your organisation produce any equality evidence sources?

Yes

11.2 If you answered "Yes" to Question 11.1, please tell us which equality evidence sources you or your organisation produce:

We produce statistics on racially motivated bullying in Scotland's schools. We believe this should be collated and published centrally by Scottish Government, and that there should be a mandatory basis for its collection. We also produce data on compliance with the Public Sector Equality Duties, and occasionally other areas including charity trustee data and BME Participation and Representation in Scottish Local Government Elections. We have, in the past, published qualitative research in areas such as volunteering, poverty, youth work and anti-racism and use of targeted addictions services by BME clients.

11.3 Are there any barriers to you or your organisation collecting more equality evidence?

Yes

11.4 If you answered "Yes" to Question 11.3, please tell us about the barriers facing you or your organisation in collecting more equality evidence:

We are largely involved in secondary research so the lack of primary race equality data impacts on our work. Funding constraints pose another barrier.

To discuss this consultation response, please contact:

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