

REPORT TO BUSINESS SERVICES COMMITTEE – 15 SEPTEMBER 2022

ABERDEENSHIRE COUNCIL RESPONSE TO THE SCOTTISH GOVERNMENT CONSULTATION ON EQUALITY EVIDENCE STRATEGY 2023-2025

1 Executive Summary/Recommendations

1.1 This report details Aberdeenshire Council's response to the Scottish Government consultation on a draft plan to improve and strengthen Scotland's equality evidence base. The responses received through this consultation will help to shape this plan, which will form the basis of Scotland's Equality Evidence Strategy 2023-2025.

1.2 The Committee is recommended to:

1.2.1 Consider, comment on and agree the draft response attached as Appendix 1 to this Report; and

1.2.2 Instruct the Head of Customer and Digital Services to submit the response to the Scottish Government before the closing date of 23 September 2022.

2 Decision Making Route

2.1 The Scottish Government is consulting on a draft plan to improve and strengthen Scotland's equality evidence base. The [consultation](#) opened on 1 July 2022 and closes on 23 September 2022.

2.2 The development of Scotland's next Equality Evidence Strategy, covering the years 2023 to 2025, will mark the conclusion of the first phase of the Scottish Government's Equality Data Improvement Programme (EDIP) (that was launched in April 2021) and aimed to lay the groundwork in strengthening Scotland's equality evidence base.

2.3 The EDIP, and in turn the new strategy, will enable policy makers to develop sound and inclusive policies to improve service delivery and outcomes for people in Scotland. The launch of the Equality Evidence Strategy 2023-25 will mark the commencement of the second phase of the EDIP, which will be a three-year programme of implementing the actions set out in the improvement plan.

2.4 This consultation builds on recent stakeholder engagement carried out by the Scottish Government on equality evidence and data and is focused specifically on shaping the overall vision and the specific actions for inclusion in the Equality Evidence Strategy 2023-25.

3 Discussion

3.1 The aim is that the new Equality Evidence Strategy will re-examine key aspects, such as the vision and purpose, but this time will be accompanied by an equality data improvement plan that sets out key milestones and priorities to filling equality evidence gaps across a range of equality variables, including the

nine protected characteristics defined under the Equality Act 2010, rather than just identifying them. It will also make clear the role of equality data in undertaking (ongoing) equality impact assessments (EQIAs) and service improvement.

3.2 The consultation is split into four sections:

1. Vision for 2023 – 2025
2. Proposed Actions
3. Use of Equality Data
4. Equality Evidence Collection

3.3 Views are sought on the following proposals:

- The vision for equality data improvement over the period 2023-25
- Review of the proposed improvement actions
- Whether the actions should be revised and prioritised
- Any additional actions that should be considered.
- Opportunities to collaborate on the equality evidence base
- Identifying networks and groups to help with collaboration
- When and how equality evidence is used
- Any barriers faced in the use of equality evidence
- Understanding who is producing equality evidence
- Any barriers faced in producing equality evidence

3.4 The response has been developed by the Business Strategy team and includes contributions from officers within Business Strategy, Tackling Poverty & Inequalities, Legal and People (Legal, Registration and HR), Housing, and Education & Children’s Services.

4 Council Priorities, Implications and Risk

4.1 This report helps deliver all six of the council’s Strategic Priorities

Pillar	Priority
Our People	Education Health & Wellbeing
Our Environment	Infrastructure Resilient Communities
Our Economy	Economy & Enterprise Estate Modernisation

4.2 The screening section as part of Stage One of the Integrated Impact Assessment process has not identified the requirement for any further detailed assessments to be undertaken. Detailed assessment is not required because this is a response to a consultation and does not have a differential impact on any of the protected characteristics or on those facing socio-economic disadvantage.

4.3 The table below shows whether risks and implications apply if the recommendations are agreed.

Subject	Yes	No	N/A
Financial		x	
Staffing		x	
Equalities and Fairer Duty Scotland			x
Children and Young People's Rights and Wellbeing			x
Climate Change and Sustainability			x
Health and Wellbeing			x
Town Centre First			x

4.4 The following Risks have been identified as relevant to this matter on a Corporate Level:

The following Risks have been identified as relevant to this matter on a Corporate Level - [Corporate Risk Register](#):

- ACORP002 – Changes in government policy, legislation, and regulation.

4.5 The following Risks have been identified as relevant to this matter on a Strategic Level - [Directorate Risks](#):

- BSSR002 - Communities are confident, resilient, and inclusive. Individuals feel secure and in control of their circumstances.

5 Scheme of Governance

5.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and had no comments to make” and are satisfied that the report complies with the Scheme of Governance and relevant legislation.

5.2 The Committee is able to consider and take a decision on this item in terms of Section C.3.1 of the List of Committee Powers in Part 2A of the Scheme of Governance as it relates to approving a Council response to any external consultation on any policy matter falling within the delegation of the Committee.

Ritchie Johnson
Director of Business Services

Report prepared by Jane Wilkinson, Policy & Performance Team Leader, Business Strategy

Date: 8 August 2022

List of Appendices:

Appendix 1 - Equality Evidence Strategy 2023-25 Consultation – Aberdeenshire Council Response

List of Consultation Questions

Section 1: Vision

In 2017, the Scottish Government set out our vision that: “Scotland's equality evidence base becomes more wide-ranging and robust, enabling national and local policy makers to develop sound, inclusive policy and measure the impact on all of Scotland's equality groups”. We would like to revisit this vision and gather views on whether the vision should be revised for the Equality Evidence Strategy 2023-25.

Question 1.1

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

- Yes
 No
 Don't know

Question 1.2

[For respondents who answered 'Yes' Question 1.1]

Please say how the Scottish Government should revise the vision:

The vision remains relevant, however it may be worth reviewing/updating this to align the vision with the equality evidence strategy document and to reflect the progress that has already been made.

The consultation document states that the strategy will enable policy makers to improve service delivery and outcomes for people in Scotland. Would it be worth considering adding this wording to the vision?

Section 2: Proposed actions

The Equality Evidence Strategy 2023-25 will specify and define individual projects required to fill the gaps that have been identified. We have identified a number of proposed actions, in the draft improvement plan.

Question 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?

- Fully
 Partially
 Not at all
 Don't know

Question 2.2

Please set out your reasons for your answer:

The Council is pleased to note the breadth and detail of the proposed actions and agrees that they will adequately deliver the ambition for a robust and wide-ranging equality evidence base. The Council would be keen to work with Scottish Government to deliver these actions to improve completeness of data and provide more disaggregated statistics.

We are encouraged to see the inclusion of areas such as justice and social security for further development. These are both areas where traditionally we have found it challenging to obtain equality data.

The proposed actions will go some way to providing a robust and wide-ranging equality evidence base.

Question 3.1

From your perspective, what are the most important actions outlined in the draft improvement plan? Please select up to five.

- Action 1
- Action 2
- Action 3
- Action 4
- Action 5
- Action 6
- Action 7
- Action 8
- Action 9
- Action 10
- Action 11
- Action 12
- Action 13
- Action 14
- Action 15
- Action 16
- Action 17
- Action 18
- Action 19
- Action 20
- Action 21

- Action 22
- Action 23
- Action 24
- Action 25
- Action 26
- Action 27
- Action 28
- Action 29
- Action 30
- Action 31
- Action 32
- Action 33
- Action 34
- Action 35

Question 3.2

Please set out your reasons for your answer:

The Actions selected relate specifically to the Council Equality Outcomes 2021-25 which were agreed by Council in September 2021, and our Community Planning Partnership Local Outcomes Improvement Plan (LOIP) priorities. These Actions will assist the Council greatly in providing robust evidence that we are achieving our outcomes.

All Actions are extremely worthwhile and valuable and will hugely support the Council as it develops and delivers the Council Plan. We are encouraged to note the alignment between the Actions and the National Performance Framework.

Historically we have struggled to obtain robust and timely equality evidence to demonstrate that we are achieving our outcomes and we welcome this development.

Question 4.1

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

- Yes
- No
- Don't know

Question 4.2

[For respondents who answer 'Yes' to Question 4.1]

Please tell us which actions you think should be revised and how:

Actions 1,3 and 34.

Education Action 1 – 3

Concerns have been raised on the 3 Actions identified under the Education section. There is a possibility that the overall numbers and information for these actions that become available may be small and that if this data were available to download in the Equality Evidence Finder tool (e.g. for API's etc) that individuals may potentially be identifiable and therefore this information will not be protected. However we would not have issue including high-level national summaries given as examples in the current available summaries though.

Action 34: Vital Events – Deaths

Aberdeenshire registrars have no objection to the proposed change to working. However, it should be noted that the registration of death has been provided remotely (i.e. by telephone) since March 2020. The laminated cards suggested in the proposal would be of little use; an alternative solution is therefore necessary, perhaps improving access to this information online, and providing suggested wording to registrars in the FER system, to be prompted at the appropriate stage of the registration procedure.

Question 5.1

There are many costs and challenges to collecting, analysing and reporting equality data. The benefits of improved equality data are clear, but unfortunately data collection is expensive and every question that is added to a survey or to an administrative data collection will have a cost. That cost will be in financial programmes, staff resource in carrying out collection and analysis, cost of training and learning necessary to implement a new collection and understand its impact on service development and also, importantly, in the burden on respondents. The proposed actions in the draft improvement plan are achievable within existing resource constraints.

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

- Yes
- No
- Don't know

Question 5.2

[For respondents who answered 'Yes' to Question 5.1]

Please tell us what additional improvement actions we should consider, and the reasons why these actions are important. For example, the groups who would benefit, or what information needs these actions would address.

N/A

Question 6.1

The Scottish Government cannot take sole responsibility for providing information to address everything stakeholders would like to know. The range of interests, perspectives and expertise require different ways of collecting and accessing data and information by the public sector (e.g. Scottish Government, local authorities), academic institutions, the third sector (e.g. charities, social enterprises, think tanks) and from within the involved communities themselves. The Scottish Government welcomes collaboration with stakeholders to improve the equality evidence base. Would you or your organisation like to collaborate with the Scottish Government on any of the proposed actions?

- Yes
 No
 Don't know

Question 6.2

[For respondents who answer 'Yes' to Question 6.1]

Please tell us which actions you would like to collaborate with the Scottish Government on (including the action number) and how:

The Council would be very keen to collaborate with the Scottish Government to improve the evidence base and would value this opportunity highly.

The main actions that we would like to be involved with are as follows:

Actions 1-3 Education
Actions 12 – 13 Poverty
Actions 14-16 Equality
Action 7 Justice
Actions 17 – 18 Housing & Homelessness
Actions 19 – 24 Health & Social Care
Action 27 Local Government
Action 28 Labour Market & Economy
Actions 29-31 Constitution, International & Migration
Actions 33-35 National Records of Scotland

Question 7.1

Are you aware of any other organisations, networks or individuals the Scottish Government should collaborate with to improve the equality evidence base?

- Yes
 No
 Don't know

Question 7.2

[For respondents who answer 'Yes' to Question 7.1]

Please tell us who the Scottish Government should collaborate with and, if applicable, on which of the proposed actions:

For Child and Education Actions

- Northern Alliance (and other regional variations).
- Skills Development Scotland.
- Tertiary education.
- Improvement Service – Local Government Benchmarking Framework – All Actions

Various Equality Networks and Groups – All Actions

- Scottish Council Equality Network – SCEN
- Fairer Duty Scotland Network
- GREC – Grampian Regional Equality Council (Other regional variations)
- Stonewall Scotland
- BDA – British Deaf Association
- RINB – Royal National Institute of Blind

Section 3: Use of equality evidence

‘Equality evidence’ refers to statistics and research across different themes for age, disability, race/ethnicity, sex/gender, religion, sexual orientation, transgender status, pregnancy and maternity and marriage and civil partnership, plus “intersections” between these characteristics (e.g. younger women; minority ethnic disabled people; older trans people etc.).

Question 8.1

How often do you or your organisations use equality evidence?

- Often
- Occasionally
- Rarely
- Never
- Don’t know

Question 8.2

[For respondents who answer “Often”, “Occasionally” or “Rarely” to Question 8.1]

Which equality evidence sources do you or your organisation use?

The Housing Service receive Homelessness statistics which are collated by Scottish Government and produced annually providing Equalities Breakdown. Statistical data is also collated and monitored by the Housing Information team and Information is provided by Housing 3rd sector agencies which links to information that is available online.

Education & Children's Services use data from various national systems, including SEEMiS, Carefirst, Scottish Government Census datasets and outputs (e.g. <https://www.gov.scot/collections/school-education-statistics/>), Insight, SDS Datahub (Skills Development Scotland), NHS Grampian Central Health Index (CHI) aggregated data.

Within our Workforce planning Team we capture workforce equality data, which is voluntarily given by our employees, usually at the onboarding stage of their employment.

Our HR teams collect and use applicant equality and diversity data and workforce equality and diversity data. We look forward to viewing the updated ONS census as we will review use too. We also regularly use the equality data which is held on My Job Scotland website.

We also use the following sources to inform policy decisions

- Scottish Census: <https://www.scotlandscensus.gov.uk/>
- Scottish Household Survey: <https://www.gov.scot/collections/scottish-household-survey/>
- Scottish Crime and Justice Survey: <https://www.gov.scot/collections/scottish-crime-and-justice-survey/>
- Scottish Health Survey: <https://www.gov.scot/collections/scottish-health-survey/>
- Scottish Government Equality Evidence finder: <https://www.gov.scot/collections/equality-evidence/>
- Scottish Government official statistics: <https://statistics.gov.scot/home>
- Scottish Social Attitudes Survey: <https://www.gov.scot/collections/scottish-social-attitudes-survey/>
- Community Planning Outcomes Profile: <https://www.improvementservice.org.uk/products-and-services/performance-management-and-benchmarking/community-planning-outcomes-profile/the-measures>

Question 8.3

[For respondents who answer “Often”, “Occasionally” or “Rarely” to Question 8.1] How do you or your organisation use equality evidence?

We use equality evidence to identify our equality outcomes.

We use equality evidence to inform our Integrated Impact Assessments.

Equality evidence is used to inform policy making and strategic decision making across the organisation, from workforce planning, to demonstrating how we are delivering our equality outcomes, our Council Plan and strategic priorities and our LOIP priorities.

Within Housing we use it in relation to review our service provision, including any changes to policy or operational procedures. Integrated Impact Assessments are also completed for returns to Scottish Government e.g. Rapid Rehousing Activities and Spend.

Within Education we would use Equality evidence for Reporting, benchmarking/comparison, and decision-making.

Within HR&OD Team, then Equality evidence would be considered for Workforce planning and the provision of statutory statistics.

When reviewing our applicant and workforce profile to assess if we are appealing to a wide and diverse range of individuals and retaining them in employment. This helps us to consider whether our recruitment processes and strategies need to be adapted/amended and how. When the updated ONS census data is published we will also have a better indicator of how our applicants and workforce reflect the communities we serve to also help with this.

Question 8.4

[For respondents who answer “Often”, “Occasionally” or “Rarely” to Question 8.1]

How do you or your organisation usually access equality evidence?

Equality evidence is accessed across the organisation through various sources listed in our response at 8.2.

Additionally, we collect local equality data within our own systems which is used to inform service provision/service changes/decision making.

Via equality data held on My Job Scotland re applicants and equality data held in our employee systems for workforce.

Question 9.1

Do you face any barriers to using equality evidence?

- Yes
 No
 Don't know

Question 9.2

[For respondents who answer 'Yes' to Question 9.1]

Please tell us about the barriers you have faced (e.g. difficulties accessing the equality evidence you require, available equality evidence not being relevant to your needs, insufficient sample size for the statistics you require):

There is inconsistency (locally and nationally) around the collection, use and interpretation of equality data. Equality evidence is sometimes restricted/limited and doesn't always provide the evidence required.

Often the sample size is insufficient and not sufficiently up to date – this is particularly the case we have found with health related data to demonstrate our LOIP priorities.

GDPR and Data Protection protocols can be barriers in terms of collecting and using data. Another barrier is when data is accessible or required to be collected, which can often depend on the service that will be accessing the information and can also clash between a school year and financial year.

Equality evidence is often not as up to date as we would like to be able to demonstrate improvements.

Question 10.1

Are there any decisions you are unable to make because of a lack of equality evidence? (For example, Equality Impact Assessments (EQIAs), policy development, service delivery)

- Yes
 No

Don't know

Question 10.2

[For respondents who answer 'Yes' to Question 10.1]

Please tell us which questions you are unable to answer and why those questions are important to answer (e.g. what policies or practices could be informed by answering those questions').

We have not yet been unable to make a decision due to lack of equality evidence, however, robust, more timely evidence would strengthen the decision making process and help us to demonstrate whether we are making progress on strategic priorities and our LOIP priorities.

We cannot currently determine if our applicant profile /workforce profile is representative of our communities as we are awaiting updated ONS census data. Comparing these data sets will give us a better idea of this.

Section 4: Equality evidence collection

Question 11.1

Do you or your organisation produce any equality evidence sources? For example, do your organisation involve stakeholders in finding out what issues they think are important through surveys or focus groups, pull together or carry out your own analysis of existing information, or commission independent research and analysis.

Yes

No

Don't know

Question 11.2

[For respondents who answer 'Yes' to Question 11.1]

Which equality evidence sources do you or your organisation produce?

Across the organisation we regularly collect equality evidence to inform decision making and policy setting. Evidence may be collected through surveys, feedback questionnaires, workforce information, focus groups, tenant participation groups, integrated impact assessments etc.

We have recently shared the updated guidance issued by the Scottish Government to ensure that we are collecting and using data appropriately.

Our organisational Equality Ambassadors meet regularly and this provides a forum for raising and discussing any equality evidence issues.

Question 11.3

[For respondents who answer 'Yes' to Question 11.1]

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

- Yes
- No
- Don't know

Question 11.4

[For respondents who answer 'Yes' to Question 11.3]

Please tell us about the barriers facing you or your organisation in collecting more equality evidence:

The main barriers faced by the Council in the context of collecting equality evidence are

- The personal and sensitive nature of equality data
- Practical, operational and / or methodological challenges arising from the context within which data collection is undertaken
- Difficulties arising from the complexity of defining equality groups using agreed and standard definitions and terminology, linked to difficulties of 'keeping abreast' of developments in this (fast-moving) field
- Organisational culture, capacity and / or capability