Annex C: Equality Evidence Strategy 2023-2025: Analysis of Responses to Consultation

March 2023

Scottish Government
Riaghaltas na h-Alba

Equality Evidence Strategy 2023-2025: Analysis of Responses to Consultation

Why Research, March 2023

Contents

Executive Summary

In April 2021, the Scottish Government launched the first phase of its Equality Data Improvement Programme (EDIP). This aims to put in place a stronger and more complete equality evidence base that will enable more inclusive policy making and support the collective effort across the public sector to fulfil the requirements of the Public Sector Equality Duty (PSED).

The publication of the next Equality Evidence Strategy, covering the period 2023-2025, will mark the end of the first phase of the EDIP. On 1 July 2022, the Scottish Government launched a consultation on a draft plan to improve and strengthen Scotland's equality evidence base. Responses received will be used to develop the Equality Evidence Strategy 2023-2025.

There were a total of 116 responses to this consultation, of which 87 were from organisations and 29 from individuals.

Key themes

A number of key themes were evident across consultation questions and consultation events as well as across respondent groups.

Overall, there was general agreement on the need for a strong equality evidence base upon which services can be designed and decisions and policy can be made. At present, there are concerns over the robustness of much of the existing evidence due to small sample sizes and gaps in the evidence base.

Respondents welcomed opportunities to improve the equality evidence base and acknowledged the need for more data across a wide range of different groups. There were some requests for consistency in the data collected across all datasets as this would allow for more robust sample sizes as well as offering an option to combine different datasets. The need for intersectional data along with a capacity to disaggregate data by sub-groups are key for many respondents.

While robust quantitative data is perceived to be a key requirement, there were also some requests for qualitative data as this can provide valuable information in its own right and also help to enhance understanding of quantitative data.

There were some calls for help and guidance for data users to maximise their understanding of how to work with and analyse data and how to use this effectively in decision-making.

The Equality Evidence Finder (EEF) was seen to be a useful tool, although there were some comments on a need to improve its utility, for example, by improving upon its accessibility, by ensuring that all data is up-to-date and offering a capacity to easily link into other datasets.

Summary of main findings

The vision (Q1)

While there is general support for various aspects of the vision, just under half (47%) of the respondents felt the Scottish Government should revise the vision developed in 2017. Key issues were requests for:

- more robust data which would allow for intersectionality and a capacity to disaggregate data

- help and guidance for data users, with information provided on how equality data can be used

- recognition of the impact of COVID-19 and the current cost of living crisis

- alignment with a range of other policies

- the introduction of outcomes, actions and monitoring to ensure the vision is adopted by all relevant organisations

- clarity in terminology used throughout the vision

Proposed actions (Qs2-7)

Over half (59%) of respondents thought the proposed actions would adequately deliver on the ambition for a robust and wide-ranging quality evidence base, to a partial extent (Q2). Reasons for this included perceived gaps in the evidence base among the proposed actions and a desire to improve the equality evidence base in general amid concerns regarding the robustness of evidence caused by small sample sizes in relation to some characteristics as well as the quality of some datasets. There were some requests for guidance on the collection, procurement, handling, analysis and representation of equality data.

When asked to say which were the five most important actions outlined in the draft improvement plan (Q3), a number of respondents commented on the difficulties of making this choice, on the basis that all actions are important. From the respondents who were able to make a choice, the most popular actions were 33 (Scotland's Census 2022) (cited by 25% of respondents), 15 (Scotland's Gender Equality Index) (cited by 21% of respondents), 16 (Scottish Social Attitudes Survey) (cited by 18% of respondents) and 1 (Looked after children) (cited by 18% of respondents). Regardless of the action(s) chosen by respondents, a number of general themes emerged, including the need for:

- more robust equality evidence

- more consistency in the way equality data is collected

- granular/disaggregated equality data

- intersectionality

Just over half (51%) of the respondents felt that there should be revisions to the proposed actions (Q4). The actions with the highest numbers of respondents suggesting a need for revisions were Actions 33, 15, 16, 13, 3, 12, 19, 21, 28 and 2. Across all actions it was felt there was a need for more complete data to be

collected on all equality characteristics across all datasets, so as to achieve larger sample sizes. There were requests for more consistency in the way data on equality variables is collected by different datasets.

When asked whether there were any additional improvement actions that should be considered that are achievable within the 2023-2025 timescale (Q5), just under half (43%) felt there were. Most of the points raised echoed those made at previous questions and very few comments were made on any additional actions; comments tended to be based on enhancing the existing actions.

The potential for collaboration (Qs 6-7)

Just under half (43%) of respondents would like to collaborate with the Scottish Government (Q6). Only small numbers of respondents specified particular actions they would like to collaborate on.

Just under half (45%) of respondents noted that they were aware of other organisations, networks or individuals the Scottish Government should collaborate with to improve the equality evidence base (Q7). The most prevalent mentions were for sex-based campaigning groups for women although there were also references to equalities organisations, councils, networks and stakeholder groups. A wide range of other organisation types were cited by relatively small numbers of respondents.

Use of equality evidence (Qs 8-10)

Just under half (46%) of respondents claimed to often use equality evidence and just under a quarter (24%) were using equality evidence occasionally (Q8). Most of these respondents used a combination of several different sources, with the most popular data sources being Population Census data or outputs and the Scottish Household Survey. The most popular platforms were the Scottish Government EEF and the Scottish Government website. The Office for National Statistics (ONS) was cited as a key organisation providing data. A wide range of subject-specific sources were mentioned. A range of generic tools for collecting data were also cited by respondents, and there were a few mentions of academic or third sector sources.

In terms of usage of equality evidence, a key use was to shape decision-making, for strategic planning or informing policy. Some respondents reported using equality evidence in reports or for Equality Impact Assessments (EQIAs). Other uses were to ensure representation of groups, to monitor trends, for tracking and benchmarking, to improve services, assess service delivery or improve ways of working.

Online access is a popular means of accessing equality evidence. Again, the Scottish Government website was noted as a source of accessing equality evidence.

Almost two thirds (65%) of respondents said they faced barriers in using equality evidence (Q9). The most often cited difficulties were inconsistency of approach and non-standardised equality evidence, particularly regarding data collection. A minority of respondents also noted difficulties in finding the required data,

information or evidence, with resource limitations also playing a part for some respondents. There were references to gaps in the equality evidence base as well as an insufficiency of disaggregated data.

When considering whether there are decisions that cannot be made because of a lack of equality evidence (Q10), views were broadly split with around a third (31%) saying decisions cannot be made because of a lack of equality evidence and around a third (34%) claiming that decisions can be made. Barriers noted by respondents included a lack of equality information which can limit intersectional analysis and disaggregated analysis.

Equality evidence collection (Q11)

Almost two thirds (61%) of respondents reported producing equality evidence sources, with a number noting they generate their own data. A range of different methods are used in collecting this data.

Half the respondents claimed their organisation faces barriers in collecting more equality evidence. These barriers include internal resource constraints, problems with the disclosure of sensitive information, insufficient sample numbers and a lack of consistency and coherence within a fragmented data landscape.

Introduction

Background

The [Equality Evidence Strategy 2017-2021](#) set out the Scottish Government's vision that "Scotland's equality evidence 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".

Listed authorities have responsibilities under the Public Sector Equality Duty (PSED) as set out in Section 149 of the Equality Act 2010, and all organisations should consider what information is needed when designing and undertaking any form of equality data collection, research and analysis to fill known evidence gaps. The [Equality Evidence Strategy 2017-2021](#) set out a four-year plan outlining the equality evidence gaps that had been identified across partner and academic organisations and detailing a strategic approach to strengthening Scotland's equality evidence base. This noted there are a number of opportunities for data and information to be collected by public sector organisations, academic institutions, the third sector and within communities as well as a number of challenges to collecting, analysing and reporting intersectional equality data.

In April 2021, the Scottish Government launched the first phase of its [Equality Data Improvement Programme (EDIP)](#). This aims to put in place a stronger and more complete equality evidence base that will enable more inclusive policy making and support the collective effort across the public sector to fulfil the requirements of the Public Sector Equality Duty.

The publication of the next Equality Evidence Strategy 2023-2025 will mark the end of the first phase of the EDIP. This new Equality Evidence Strategy will re-examine key aspects of the 2017-2021 Strategy and 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.

The consultation

On 1 July 2022, the Scottish Government launched a consultation on a draft plan to improve and strengthen Scotland's equality evidence base. Responses received to this consultation will be used to develop the Equality Evidence Strategy 2023-2025, which will be published in March 2023. It is intended that the strategy will further enable policymakers to develop sound and inclusive policies to improve service delivery and outcomes for the people of Scotland.

The consultation ran until 7 October 2022. This asked 32 questions, of which 15 were closed inviting yes/no/don't know responses and 17 were open inviting a free text response option.

Alongside this consultation, the Scottish Government also undertook six engagement events.

Respondent profile

In total, there were 116 responses to the consultation, of which 87 were from organisations and 29 from individuals. A list of all those organisations that submitted a response to the consultation is included in Appendix 1. Respondents were assigned to groupings to allow analysis of any differences or commonalities across or within the various different types of organisations and individuals that responded. The following table provides the profile of those who responded to this consultation.

Table 1: Respondent profile

	Respondent sub-group
Equalities/advocacy groups	31
Public sector	47
Other organisations	9
Total organisations	**87**
Individuals	29
Total respondents	**116**

Methodology

Responses to the consultation were submitted using the Scottish Government consultation platform Citizen Space or by email. A small number of respondents submitted a response which did not answer the specific questions. These responses were analysed and incorporated into the report at the relevant sections. All responses were downloaded into an excel database which formed the basis for analysis of responses.

Those attending stakeholder events represented the range of equality characteristics covered by the strategy. The questions posed at these events did not follow the structure of the consultation questions but focused on how to improve access to equality evidence, how to improve the use of equality evidence and the vision for equality data improvement by 2025. Mural boards from each event were provided to the researchers and the findings were included in analysis at the relevant questions. By and large, the same issues were raised in responses to the consultation and at consultation events. Where different issues were raised at the stakeholder events, these are highlighted in this report.

It should be borne in mind that the number responding at each question is not always the same as the number presented in the respondent group table. This is because not all respondents addressed all questions. This report indicates the number of respondents who commented at each question. When referring to respondents who made particular comments, the terms 'a small number', 'a few'

and so on have been used. While the analysis was qualitative in nature, with the consultation containing only a limited number of quantifiable questions, as a very general rule of thumb it can be assumed that:

- 'a small number' indicates up to 5 respondents
- 'a few indicates around 6-9 respondents
- 'a small minority' indicates around more than 9 respondents but less than 10%
- 'a significant minority' indicates between around 10-24% of respondents
- 'a large minority' indicates more than a quarter of respondents but less than half
- 'a majority' indicates more than 50% of those who commented at any question

Some of the consultation questions were composed of closed tick-boxes with specific options to choose from. Where respondents did not follow the questions but mentioned clearly within their text that they supported one of the options, these have been included in the relevant counts.

The researchers examined all comments made by respondents and noted the range of issues mentioned in responses, including reasons for opinions, specific examples or explanations, alternative suggestions or other comments. Grouping these issues together into similar themes allowed the researchers to identify whether any particular theme was specific to any particular respondent group or groups. Where any specific sub-group(s) held a particular viewpoint, this is commented on at each relevant question.

When considering group differences, however, it must also be recognised that where a specific opinion has been identified in relation to a particular group or groups, this does not indicate that other groups did not share this opinion, but rather that they simply did not comment on that particular point.

While the consultation gave all who wished to comment an opportunity to do so, given the self-selecting nature of this type of exercise, any figures quoted here cannot be extrapolated to a wider population outwith the respondent sample.

The Vision

The consultation paper noted that the Scottish Government had set out the vision in the Equality Evidence Strategy 2017-2021 that "Scotland's equality evidence base becomes more wide-ranging and robust, enabling national and local policymakers to develop sound, inclusive policy and measure the impact on all of Scotland's equality groups". This consultation revisited this vision and respondents were asked for their views on whether the vision should be revised for the Equality Evidence Strategy 2023-2025. The first question asked:

Q1.1: Do you think the Scottish Government should revise the vision developed in 2017?

As demonstrated in Table 2, just under half (48%) of the respondents felt that the Scottish Government should revise the vision developed in 2017 compared to just over a quarter (28%) who felt the vision did not need revising.

Table 2: Level of agreement on whether the Scottish Government should revise the vision developed in 2017

	Yes	No	Don't know	No response
Equalities/advocacy groups (31)	16 (51%)	9 (29%)	2 (6%)	4 (13%)
Public sector (47)	23 (49%)	13 (28%)	3 (6%)	8 (17%)
Other organisations (9)	3 (33%)	3 (33%)	1 (11%)	2 (22%)
Total organisations (87)	**42 (48%)**	**25 (29%)**	**6 (7%)**	**14 (16%)**
Individuals (29)	14 (48%)	7 (24%)	8 (28%)	-
Total respondents (116)	**56 (48%)**	**32 (28%)**	**14 (12%)**	**14 (12%)**

All respondents who provided an answer of 'yes' to this question, were then asked to say how the Scottish Government should revise the vision. A total of 60 respondents commented.

A few respondents noted their support for various aspects of the vision, albeit some of these referred to the need to enhance the vision, for example, by ensuring that robust data is captured. There was general agreement from a few respondents of the need to have access to better evidence and data so as to make better evidence-informed decisions which in turn will lead to greater transparency and accountability. This would also help listed authorities under their commitment to the Public Sector Equality Duty (PSED) and lead to improved outcomes for marginalised groups.

The need for a greater emphasis and understanding of intersectionality was highlighted by a significant minority of the respondents answering this question.

There was a recognition of the need for robust data that can allow organisations to measure the impact on all equality groups and have high-quality disaggregated data to allow for intersectional analysis. Furthermore, there should be the ability to combine different datasets to make full use of all information gathered so that this can be used effectively to inform policy making and resource allocation.

There was a recognition that data users may need some help and guidance on how to work with data that is collected. Linked to this, there were a small number of comments that there is a need for clarity over analysis of data when it has been collected. One organisation in the equalities/advocacy sub-group noted the need for training and building capacity to understand how to work with data and how to apply this to the policy making process.

Allied to this last point, a small minority of respondents felt the vision should provide information on how data can, and should, be used. For example, an equalities/advocacy organisation felt the vision should set out expectations that any data gathered will be used to inform the work of listed authorities if they are to meet their duties under PSED. A public sector organisation suggested the vision should incorporate how policy is enacted and how those responsible for delivering public services should be making use of robust equality evidence to inform their decision-making, planning their services and understanding the impact of these services on all equality groups. Another equalities/advocacy organisation felt an explanation of how data will feed into policy would help to build trust with the Scottish public on the collection and use of equality data. As noted by a public sector organisation:

> "Public bodies need to have access to better evidence/ data to make better evidence informed decision making which will lead to increased transparency and accountability. The better use of equality evidence and data will help public bodies to better perform the Public Sector Equality Duty. If achieved, this will lead to improved outcomes (experiences) for marginalised groups (including, but not limited to people with protected characteristics, there are other disadvantaged groups)."

Another key theme emerging, albeit only cited by a small minority of those answering this question, was of a need to recognise changes that impact upon data collected and how this is used. Two key examples provided by respondents were of the need to take into account the impact of COVID-19 and the equality issues it raised as well as considering the context and opportunity of pandemic recovery; and the current cost of living crisis which is perceived to be impacting on large numbers of people across Scotland. For example, one organisation noted that the impacts of COVID-19 and the cost of living crisis have altered Scotland's data collection requirements and there is now a need for consistency in data collection to reflect changes in society. A public sector organisation noted that any plans need to evolve over time to reflect the changing data and informational needs of organisations.

A need to align with other policies was highlighted by a small minority of respondents. This included a closer alignment between the Equality Evidence Strategy 2023-2025 and the Tackling Child Poverty Delivery Plan 2022-26. Other

references included the need to review the vision and ensure it is aligned and integrated with other Scottish Government areas such as Public Sector Equality Duty (PSED), the forthcoming Equality and Human Rights Mainstreaming Strategy, the Programme for Government and the National Performance Framework. It was felt this alignment would demonstrate part of a wider strategy for embedding equality, inclusion and human rights across the public sector as a whole.

While respondents on the whole were supportive of the vision, there were suggestions from a small minority of the need for outcomes, actions and monitoring to ensure that the vision is being adopted by all relevant organisations. There were comments that there is a need to refer to measurement and understanding of the impact on equality groups so as to measure progress of the revised vision and ensure it is having the required impact.

A significant minority of respondents commented on the terminology used. Many of these respondents focused on the need for greater clarity about the terms 'sex' and 'gender' and what is meant by each, with some noting a preference for data on 'biological sex'. A public sector organisation noted that the vision needs to be jargon-free.

In revising this vision, there were a few requests for consultation and engagement with stakeholder organisations so as to gather a wider understanding of what changes are needed to ensure all people receive equal access to services and that these services are designed to meet the needs of service users in line with equality variables.

Other comments made by small numbers of respondents included:

- a request for recognition of socio-economic disadvantage, given its links with protected groups
- there is no mention of single parents in the vision which will lead to evidence gaps that are fundamental to achieving the Scottish Government's own child poverty targets
- the existing PSED to gather and use employee data is not delivering on its intended outcome
- the standard of EQIAs across local authorities and public bodies is very mixed
- a clear funding strategy should accompany any requests for more data collection
- a need to be more ambitious in the vision

Proposed actions

The consultation paper set out a number of actions identified by the Scottish Government and National Records of Scotland (NRS) across a number of key themes. It noted that these actions cover improvements to the data on a range of equality variables, including all nine of the protected characteristics. These improvements are set within a timeframe until the end of 2025.

The consultation paper highlighted various datasets that are currently used across a range of analytical areas within the Scottish Government including: education; justice; social security; poverty; equality; housing and homelessness; health and social care; transport; local government; labour market and the economy; constitution, international and migration; rural and environment; plus NRS. For each dataset, actions were outlined that are required to fill data gaps that have been identified, along with a timeline and the equality variables that will be covered by each dataset. Question 2 asked:

> **Q2.1: 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?**

As shown in Table 3, just under two-thirds of respondents (59%) thought the proposed actions would adequately deliver on the ambition for a robust and wide-ranging quality evidence base to a partial extent. Only a small number believed these actions would deliver fully. Just under one in five (16%), almost all of them individuals, believed the proposed actions would not deliver at all on the ambition for a robust and wide-ranging equality evidence base.

Table 3: Extent to which the proposed actions would adequately deliver on the ambition for a robust and wide-ranging equality evidence base

	Fully	Partially	Not at all	Don't know	No response
Equalities/advocacy groups (31)	1 (3%)	17 (55%)	2 (6%)	4 (13%)	7 (23%)
Public sector (47)	3 (6%)	31 (66%)	-	7 (15%)	6 (13%)
Other organisations (9)	-	8 (89%)	-	-	1 (11%)
Total organisations (87)	**4 (5%)**	**56 (64%)**	**2 (2%)**	**11 (13%)**	**14 (16%)**
Individuals (29)	-	13 (45%)	16 (55%)	-	-
Total respondents (116)	**4 (3%)**	**69 (59%)**	**18 (16%)**	**11 (9%)**	**14 (12%)**

Respondents were then asked to provide reasons for their answer and a total of 93 respondents did so. The largest numbers – a large minority overall mainly consisting of public sector and equalities/advocacy organisations – pointed out

perceived gaps in the evidence base among the proposed actions. A wide variety of instances were given, each by single or very small numbers of respondents, including:

- more data usage from pre-hospital and ambulance service sources
- improved data collection on ethnicity, with comments that the Equality Act 2010 includes the need to monitor outcomes by colour and nationality (i.e. not solely using colour-coded categories) or national origins
- more data relating to the work of different types of public sector bodies such as museums and galleries
- more localised data regarding regional or remoter geographical areas
- a requirement for adult social care and social work indicators regarding development of the national care service and the social security system
- more data from the education sector (e.g. on sexual orientation as well as transgender identity)
- a linkage between hospital Medical Records and GP records
- improved data relating to those living in poverty (e.g. for single mother families, by gender identity, better collection of income data for identifying those in poverty, employment structure in minority ethnic households)
- more nuanced older age/65+ age categories

In addition, a small number of respondents advocated for the inclusion of other specific datasets including the Pupil Census, the Early Learning and Childcare Census, Scottish Children's Reporter Administration statistics and the Scottish Health Survey, without specifying actions for which they should be used.

A large minority of respondents expressed a desire to improve the equality evidence base generally, citing the collection and completeness of data within the actions as being limited in scope. There were requests for more disaggregated statistics, intersectional data, and greater amounts of data on all the protected characteristic groups to give a more detailed picture. Recommendations were also made to join together datasets to give added evidential value as opposed to using compartmentalised data. A few respondents advocated for a strategic approach to evidence improvements, such as having a clear rationale or focus on the optimal usage of statistics towards areas where the data can have the greatest impacts on decision-making, given limited resource availability. One example is given below:

> "For instance, under looked after children (LAC) there is a proposal to collect improved data on disability but it is unclear if this is in relation to the parents of LAC or if it is in relation to the children who are looked after and therefore the purpose and use of the data is unclear. If it is in relation to parents is the purpose to be able to see if there is any impact on how parents disabilities are viewed by social workers and how it is taken into account in the decisions they make. Providing a clearer rationale will work to build data use, rather than just data collection, into the system." (Equalities/Advocacy)

Similar numbers of respondents did, however, comment positively on the actions, welcoming them as a step in the right direction as well as remarking positively about the increased availability of equality datasets. A few respondents saw the actions as broad and providing adequate coverage of a wide range of areas.

Guidance on the collection, procurement, handling, analysis and representation of data was requested by a significant minority. Common standards and data harmonisation were suggested to help ensure consistency of reporting, along with a human rights-based approach with attention to General Data Protection Regulation (GDPR) duties and accountability and transparency of activities.

Issues were raised by a significant minority regarding the robustness of evidence caused by small sample sizes in relation to some of the protected characteristics, in particular ethnicity and trans status data. Associated problems included data protection requirements regarding the identification of individuals and insufficient data being available to provide quantifiably analysable results. A need for increased sample sizes was advocated, with two organisations considering combining data from different years in order to get a robust sample.

A significant minority raised other concerns about the quality of datasets. Mention was made of difficulties obtaining equality data in areas such as justice, social security and poverty, as well as problems with data collection for the Population Census and a perceived lack of validation checks on data entry generally; prompts about missing data were put forward as a solution for the latter. Most concerns were over 'missing' sensitive equality-related data skewing the analysis. Members of the public were seen to be reluctant to provide such information, with work needed to encourage them to provide this data by persuading them of the benefits of doing so.

A few organisations thought there should be a role for qualitative data, citing the usefulness of lived experience as part of the equality evidence base.

A significant minority, mostly individual respondents, centred their answers on confusion and concerns over the definitions of sex and gender. The language used in the actions was regarded as being confused and unclear, with discrepancies in the use of the terms between the different actions, particularly over which of these is a protected characteristic (sex). It was also affirmed that sex and gender should be two discrete characteristics, and that the actions should distinguish sex as biologically defined. Further concerns were voiced by a small minority perceiving that sex and gender definitions impacted negatively on women, allied to a lack of attention being paid to women regarding equality issues, in particular safety and the protection of women's spaces.

Concerns over statistics and policies regarding transgender **people** were also mentioned by a significant minority (mainly individuals). These respondents noted that a clear definition was needed, that this wasn't an equality variable listed as a protected characteristic under some actions, that there was a need to ask for information on both sex and gender, that there was a lack of evidence was

available on the EEF and that biological health needs must not be based on self-identification of gender.

A few respondents mentioned other issues with terminology, citing examples with accuracy, the erratic use of terms and incoherent terms used for the nine protected characteristics (e.g. conflation of race and ethnicity).

Further points were made by small or very small numbers of respondents as follows:

- a need to widen the scope of the range of characteristics under consideration in the actions beyond the equality characteristics already covered (extra categories suggested included neurodivergence, care experience and single parents)
- a need to find out more about the proposed actions (e.g. through further engagement)
- negative comments generally about the actions doing more harm than good or there being too much focus on the diversity agenda

Question 3 then asked respondents:

Q3.1: From your perspective, what are the most important actions outlined in the draft improvement plan? Please select up to five.

A number of respondents noted difficulties in choosing up to five specific actions, with some noting that all actions were important or worthwhile. Often, the actions chosen by respondents reflected the sector in which they operate. The following table outlines the number of respondents choosing each of the actions. As this demonstrates, the actions cited by the highest numbers of respondents were:

- Action 33 (Scotland's Census 2022) (cited by 25% of respondents)
- Action 15 (Scotland's Gender Equality Index) (21% of respondents)
- Action 16 (Scottish Social Attitudes Survey (SSAS) – Attitudes to Discrimination Model) and Action 1 (Looked after children); each of which was cited by more than 20 respondents (both mentioned by 18%).

Table 4: Actions perceived to be the most important

	Number choosing each action
Action 33 (NRS – Scotland's Census 2022)	29 (25%)
Action 15 (Equality – Scotland's Gender Equality Index)	24 (21%)
Action 1 (Education – Looked after children)	21 (18%)
Action 16 (Equality – Scottish Social Attitudes Survey (SSAS) – Attitudes to Discrimination module)	21 (18%)

Action 13 (Poverty – various)	18 (16%)
Action 3 (Education – Growing Up in Scotland)	15 (13%)
Action 12 (Poverty – Family Resources Survey (FRS): Food security data	15 (13%)
Action 19 (Health and Social Care – Health and Care Experience Survey)	14 (12%)
Action 21 (Health and Social Care – various data relating to women's health)	14 (12%)
Action 2 (Education – Child protection)	13 (11%)
Action 28 (Labour Market and the Economy – ONS Annual Population Survey (APS)	13 (11%)
Action 5 (Justice – various)	10 (9%)
Action 14 (Equality – ONS Time Use Survey (OTUS))	11 (9%)
Action 17 (Housing and Homelessness – Homelessness data collections HL1 and PREVENT1)	10 (9%)
Action 18 (Housing and Homelessness – Scotland's Census 2022 equality results: housing analysis)	11 (9%)
Action 4 (Justice – various)	8 (7%)
Action 10 (Social Security – Social Security Scotland Client Survey)	8 (7%)
Action 11 (Social Security – Scottish Welfare Fund)	8 (7%)
Action 6 (Justice – Scottish Crime and Justice Survey (SCJS))	7 (6%)
Action 9 (Social Security – Social Security official statistics)	7 (6%)
Action 7 (Justice – various)	6 (5%)
Action 24 (Health and Social Care – Mental Health Inpatients Census (MHIC))	6 (5%)
Action 25 (Transport – Scottish Household Survey (SHS) Transport Components)	6 (5%)
Action 23 (Health and Social Care – Core Dataset for Tier 2 and Tier 3 Weight Management Services for Children/Young People and Adults in Scotland)	4 (3%)
Action 8 (Justice – Police Scotland Homicide data)	3 (3%)
Action 22 (Health and Social Care – Primary Care (General Practice Workforce Survey Scotland))	3 (3%)
Action 27 (Local Government – Scottish Household Survey (SHS) – Trust in Public Organisations – National Performance Framework Indicator)	3 (3%)

Action 31 (Constitution, International and Migration – Diversity in Political Representation in Scotland: Data Improvement Project)	3 (3%)
Action 35 (NRS – Small Area Statistics)	3 (3%)
Action 20 (Health and Social Care – Primary Care Out of Hours Workforce Survey)	2 (2%)
Action 26 (Transport – STATS 19 – Reported Road Casualties)	2 (2%)
Action 29 (Constitution, International and Migration – Scottish Household Survey (SHS) – Importance of Voting in Local Elections questions)	2 (2%)
Action 30 (Constitution, International and Migration – Scottish Social Attitudes Survey: Attitudes to Government and Political Engagement)	1 (1%)
Action 32 (Rural and Environment – June Agricultural Census)	1 (1%)
Action 34 (NRS – Vital Events – Deaths)	1 (1%)

Regardless of which actions were chosen by respondents, similar comments were made for each. These included:

- the action will help to provide robust evidence or more equality data

- it can help to inform interventions early on and inform work with partners to deliver programmes aimed at providing better opportunities

- there is a need for more consistency in the way some protected characteristic data is collected

- there is a need for intersectional data

- there is a general need for granular/disaggregated data

- various groups with protected characteristics are underrepresented

- the specified action(s) ties in with corporate priorities or equalities outcomes.

- the action is a priority indicator for inequalities

- there is a need for more equality data

Of the 14 respondents who did not select any of the actions outlined, the key comment was that it was not possible to prioritise any of these given that they cover a wide range of important issues. There were a small number of general comments that there is a general lack of equality data in Scotland and that more needs to be done to try to improve the data robustness of equality evidence across all actions.

Having ascertained which of the actions were considered to be most important, the next question asked:

Q4.1: Are there any proposed actions that you think should be revised?

As shown in Table 5, just over half (51%) the respondents felt that any of the proposed actions should be revised compared to less than a quarter (18%) who felt no revisions were needed.

Table 5: Whether there are any proposed actions that should be revised

	Yes	No	Don't know	No response
Equalities/advocacy groups (31)	16 (52%)	3 (10%)	3 (10%)	9 (29%)
Public sector (47)	12 (26%)	16 (34%)	9 (19%)	10 (21%)
Other organisations (9)	5 (56%)	1 (11%)	1 (11%)	2 (22%)
Total organisations (87)	**33 (38%)**	**20 (23%)**	**13 (15%)**	**21 (24%)**
Individuals (29)	26 (90%)	1 (3%)	1 (3%)	1 (3%)
Total respondents	**59 (51%)**	**21 (18%)**	**14 (12%)**	**22 (19%)**

All those respondents who answered 'yes' to Q4.1 were then asked to say which actions they felt needed to be revised. Some of these respondents provided general comments although some referred to specific actions. The actions with the highest numbers of respondents suggesting a need for revisions were Action 33 (cited by 25% of respondents), Action 15 (21%), Action 16 (18%), Action 13 (16%), Actions 3 and 12 (both 13%), Actions 19 and 21 (12%), and Actions 28 and 2 (11%).

Key themes across all actions

A number of key themes emerged across all these actions. There was agreement of an overall need for more complete data to be collected on all priority groups across all datasets, to obtain larger sample sizes and a commitment to producing this analysis as standard. This includes full data across all equality characteristics to ensure there is access to support for all people. There were also some requests for equality data to be provided at more localised geographies, including local authority level and regional and local levels; or for a capacity to be able to add socio-economic filters to different datasets, albeit there were also acknowledgements of the difficulties of obtaining robust data across a number of the protected characteristics because of small sample sizes. A small number of respondents also suggested it would be useful to collect data on other characteristics such as neurodivergence or care experience.

There were also requests for consistency in the way data is collected across different datasets across Scotland. One example given was of a need for harmonised age bands or categories. A number of respondents also agreed on the need for an intersectional approach to data collection and analysis as well as having robust sample sizes that allow for the disaggregation of data.

While there was an acknowledgement of the need for robust quantitative data on which to base decision-making, there were also some calls for more qualitative data

as this can enhance understanding of the issues impacting upon specific groups of people. There were also a small number of suggestions of the need to ensure all data collected is accessible to users and for training or guidance to be provided on how to work with, use, analyse and interpret data.

Some organisations also noted the need for a commitment to co-design and co-production work, rather than just engagement and consultation, as lived experience can provide data collectors with valuable information in terms of question development.

Other points raised throughout responses included requests to replace 'gender' with 'sex' or 'sex/gender' with 'sex'; and to remove the terms 'trans status' and 'transgender identity' as they are not protected characteristics and to replace them with 'gender reassignment'.

The following paragraphs provide comments on each of the specific actions.

Education

This incorporates Actions 1-3, which are Looked after children, Child protection and Growing Up in Scotland (GUS).

Key changes suggested by respondents included:

- removal of the option 'prefer not to say' for questions on sex as this could lose vital data (all 3 actions)
- collect data on care experience (Action 1 specifically)
- there is potential for further data collection to identify differences among a range of white ethnicities, in line with Scotland's Census 2022 (Action 2 specifically)
- there should be more granular data on disability (all 3 actions)
- there should be questions on sexual harassment in schools and other educational settings (Action 3)

Justice

This incorporates Actions 4-8, which include the Scottish Crime and Justice Survey (SCJS), Police Scotland homicide data and various other datasets.

Key changes suggested by respondents included:

- provision of data on sentencing and profiles (all 5 actions)
- provision of data on characteristics of victims as well as perpetrators of crime (all 5 actions)
- need to consider gender, sexual orientation and disability (Action 6)
- include minority ethnic peoples' experiences of policing, access to legal advice and support and experiences in the justice system (Action 5)

- more granular categories (currently there are no harmonised age bands or categories across different datasets in Scotland) (all 5 actions)
- collect data on sexual orientation and gender reassignment (all 5 actions)
- there is a need to understand the intentions behind this action, for example, to provide clarification over what policies or practices this data would inform (Action 8)

Social Security

This incorporates Actions 9-11, which include Social Security official statistics, Social Security Scotland Client Survey and the Scottish Welfare Fund (SWF).

Key changes suggested by respondents included:

- provision of data on single parents and families with babies under the age of one as this would help to identify if people in these groups are applying for and getting the benefits to which they are entitled, and allow for targeted action (Actions 9 and 10)
- data should reflect the six priority groups in the Scottish Government's Tackling Child Poverty Delivery Plan (Actions 9 and 10)
- there is a need for data to be provided at a city/regional/local authority level (Actions 9 and 10)
- provision of data on pregnancy and maternity (Actions 9 and 10)
- more granular categories (currently there are no harmonised age bands or categories across different datasets in Scotland) (Action 11)
- inclusion of data on sexual orientation and disability for those applying for SWF (to include numbers awarded, refused grants, reasons for applying, items awarded, reasons for rejection) (Action 11)
- need for data on impairment categories for Adult Disability Payment and Child Disability Payment as this will help to understand differences in those with experience of the social security system (Actions 9, 10 and 11)
- data on clients for whom English is an additional language (Action 10)

Poverty

This incorporates Actions 12-13, which include the Family Resources Survey (FRS): Food Security Data and various other poverty related surveys/associated analytical resources.

Key changes suggested by respondents included:

- provision of data on the cost of living crisis and fuel insecurity; data is needed quickly given this current context (both actions)
- focus on improving access to gendered poverty data (Action 13)
- the Scottish Government should deliver the recommendations outlined in Commission on Widening Access (COWA) on free school meals and other indicators on poverty (both actions)

- the Scottish Government should deliver the recommendations outlined in the Learning Journey on implementing a unique learning number (both actions)
- the Wealth and Assets data should offer geographical cover across Scotland (Action 13)
- data should reflect the six priority groups in the Scottish Government's Tackling Child Poverty Delivery Plan (both actions)
- there should be the same equality variables as Action 23 (Core Dataset for Tier 2 and Tier 3 Weight Management Services for Children/Young People and Adults in Scotland) as these can influence food insecurity (Action 12)

Equality

This incorporates Actions 14-16, which include the ONS Time Use Survey (OTUS), Scotland's Gender Equality Index and the Scottish Social Attitudes Survey (SSAS) – Attitudes to Discrimination module.

Key changes suggested by respondents included:

- harm reduction and safeguarding are crucial in this action but the consultation paper does not indicate how findings will be presented (Action 16)
- SSAS – Attitudes to Discrimination module should be included in the survey at regular intervals to track progress over time; particular attention should be paid towards disability and long-term conditions in the 2025 report (Action 16)

Housing and Homelessness

This incorporates Actions 17-18, which include Homelessness data collections (HL1 and PREVENT 1) and Scotland's Census 2022 equality results: housing analysis.

Key changes suggested by respondents included:

- a less vague commitment to the data that will be collected and clear motivations for an equality characteristic not being relevant (Action 17)
- provision of data on exclusion, mental health, substance misuse and offending (Action 17)
- timeframes need to be quicker and take account of advisory guidance, Collecting Equality information: National Guidance for Scottish Landlords (Action 17)
- there is a need to measure disability in a consistent manner (Action 17)
- there is a need to provide data on types of impairment and medical conditions (Action 17)
- there needs to be data on undeclared housing residents (Action 18)

Health and Social Care

This incorporates Actions 19-24, which include the Health and Care Experience Survey, Primary Care Out of Hours Workforce Survey, various data relating to

women's health, Primary Care (General Practice) Workforce Survey Scotland, the Core Dataset for Tier 2 and Tier 3 Weight Management Services for Children/Young People and Adults in Scotland and Mental Health Inpatients Census (MHIC).

Key changes suggested by respondents included:

- the actions are weighted towards health and there needs to be reference to sources of data about social care as well as information on who provides care (all actions)
- equity of access for all to clinical trials (all actions)
- sex should be added to the equality variables as it is relevant (Actions 23 and 24)
- align with the priority actions under the women's health plan (Action 21)
- the timelines under sub-actions A-E are too ambitious (Action 23)
- the Health and Care Experience Survey is biased as it is distributed via GP surgeries and only completed by a small group of patients; there should be a larger sample size and more questions in relation to social care. This does not account for groups of patients such as those in minority ethnic groups who are unlikely to self-report (Action 19)
- provision of data on ethnicity, long-term conditions and pregnancy/maternity, women's experiences of menopause and its impact on health and employment, to obtain a more representative breakdown or population experience (Actions 19, 21 and 24)
- the proposal to 'investigate' should be strengthened to be a key priority (Action 20)
- there is no linkage between hospital medical records and GP medical records (all actions)

Transport

This incorporates Actions 25-26, which include the SHS: Transport components and STATS 19 – Reported Road Casualties.

Key changes suggested by respondents included:

- provision of data on protected characteristics for neighbourhoods, communities, access to and confidence in using digital /online resources, welfare applications etc. (Action 25)
- provision of data on walking; there is a need for a strategic monitoring system across Scotland to provide this data (Action 25)
- the detail provided is too vague and more information is needed on what breakdowns are envisaged (Action 25)
- there is a need for data on the ethnicity of casualties (Action 26)

Local Government

This incorporates Action 27, which is the SHS – Trust in Public Organisations – National Performance Framework (NPF) Indicator.

The key change for Action 27 suggested by respondents was:

- provision of data on protected characteristics for neighbourhoods, communities, access to and confidence in using digital/online resources, welfare applications etc

Labour Market and the Economy

This incorporates Action 28, which is the ONS Annual Population Survey (APS).

The key changes for Action 28 suggested by respondents included:

- provision of data on disabled people in the labour market
- this is too narrow in scope and needs to include additional data such as disability, age and sex
- the Scottish Government should work with ONS and Department for Work and Pensions (DWP) to improve the sample design to allow greater access to intersectional data, and allocate resources for boosting sample size

Constitution, International and Migration

This incorporates Actions 29-31, which are the SHS – Importance of Voting in Local Elections questions, SHS – Attitudes to Government, and Political Engagement and Diversity in Political Representation in Scotland: Data Improvement Project.

The key changes suggested by respondents included:

- provision of data on protected characteristics for neighbourhoods, communities, access to and confidence in using digital/online resources, welfare applications etc (Action 29)
- provision of data on "marginalised or minoritised groups" (Action 30)
- provision of additional data on disability (Action 30)
- inclusion of questions on income as per SSAS (Action 31)
- diversity in Political Representation in Scotland needs to be rolled out for other elections (Action 31)

Rural and Environment

This incorporates Action 32, which is the June Agricultural Census.

The key change to Action 32 suggested by respondents was for further breakdowns of data in terms of geography.

National Records of Scotland (NRS)

This incorporates Actions 33-35 which are Scotland's Census 2022, Vital Events – Deaths and Small Area Statistics.

The key changes suggested by respondents included:

- ensure the time period between gathering the data and publication of the data is as minimal as possible (Action 33)

- harmonise the data with existing national statistics (Action 33)

- disability status data should be collected for death registrations (Action 34)

- many disabled adults do not qualify for council tax exemption as disregarded adults, so data on the reduction scheme for disabled people would be useful (Action 35)

The consultation paper then noted that there are many costs and challenges to collecting, analysing and reporting equality data. While the benefits of equality data are clear, data collection is expensive and every question that is added to a survey or to an administrative data collection will have a cost. The consultation paper went onto say the proposed actions in the draft improvement plan are achievable within existing resource constraints.

The next question went onto ask:

> **Q5.1: Are there any additional improvement actions that you think should be considered that are achievable within the 2023-2025 time period?**

As shown in Table 6, just under half (43%) the respondents felt there are additional improvement actions that should be considered.

Table 6: Whether there are any additional improvement actions that should be considered

	Yes	No	Don't know	No response
Equalities/advocacy groups (31)	15 (48%)	3 (10%)	3 (10%)	10 (32%)
Public sector (47)	20 (43%)	10 (21%)	9 (19%)	8 (17%)
Other organisations (9)	5 (56%)	1 (11%)	1 (11%)	2 (22%)
Total organisations (87)	**40 (46%)**	**14 (16%)**	**13 (15%)**	**20 (23%)**
Individuals (29)	10 (34%)	6 (21%)	10 (34%)	3 (10%)
Total respondents	**50 (43%)**	**20 (17%)**	**23 (20%)**	**23 (20%)**

Respondents who felt that additional improvement actions should be considered were then asked to say which ones should be considered, along with reasons as to why. A total of 50 respondents provided comments.

To an extent, many of the comments echoed points made in the previous questions and very few comments were provided on any additional actions that were needed. Many of the comments were about enhancing the existing actions, rather than creating new ones. The key issues raised included:

- agreement on the importance of having a strong evidence base on which decisions and policy can be made, including having robust sample sizes across all data collection mechanisms for all the equality characteristics

- the need for intersectional data to help reveal sub-groups within the population who will have different needs and challenges. There were also some comments that data and statistics gathered tend to treat groups with protected characteristics as being homogenous when this is not the case and there can be many sub-group differences across each of the protected characteristics

- the need for national data to be segmented at a regional, local and local authority level. A need was also identified for improved data collection across rural and urban areas so that, for example, issues specific to the Island communities can be highlighted

- the need for disaggregated data across a range of protected characteristics and by socio-economic, cultural or geographical sub-groups. Again this requires sufficiently robust sample sizes

- there were requests for consistency across population surveys so the same information is collected. This would help to extend the robustness of data gathered and enable different datasets to be combined. Examples included the need for harmonised age bands, disability information and sex

- the accessibility of data was cited by a few respondents and there were suggestions for guidance to be provided in order to help promote good practice on the collection, analysis and interpretation of data, and support for stakeholders so they can understand how to maximise the use of datasets in developing services and making policy

- while quantitative data is perceived to be fundamental to decision making, there were also calls for qualitative data to sit alongside this as it can help to enhance understanding and interpretation of quantitative data

- greater collaboration between the Scottish Government and other public bodies

Additional improvement actions noted by respondents included data capture and analysis on:

- gypsy/travellers
- children and young people with long term COVID-19
- asylum seekers and refugees
- the inclusion of other non-protected characteristics such as neurodivergence or care experience
- lived experience (across all actions)

- hospital discharges

- human rights

- children's rights

- sports participation

- socio-economic disadvantage

- white minority ethnic groupings

- care experience

Finally, a few comments were made regarding the EEF and the need to improve its utility, for example, in creating ways to present and make it easy to find intersectional data or to create links between the drivers of poverty and poverty themes on the EEF. At some of the consultation events there were comments of a need to increase the utility of the EEF by including more data that is up-to-date and that can link easily to other datasets. One example given of out-of-date data was the 'healthcare experiences' section for GPs which had a link to the Health and Care Experience Survey in 2013, although the survey from 2021 had been published. A few respondents also felt the EEF needs to be more accessible to users and offer a good search function. There were also a few calls to increase awareness of the EEF and how it can be used to maximum benefit. A small number of individuals at the consultation events also noted the usefulness of a one-stop-shop which could be used to access relevant data, with one of these noting that there is a lot of reinventing the wheel across different organisations, rather than the pooling of information and data.

The potential for collaboration

The consultation paper noted 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, academic institutions, the third sector and from within the involved communities themselves. It then noted the Scottish Government welcomes collaboration with stakeholders to improve the equality evidence base.

The next question asked:

> **Q6.1: Would you or your organisation like to collaborate with the Scottish Government on any of the proposed actions?**

As shown in Table 7, just under half (43%) the respondents noted they would like to collaborate with the Scottish Government.

Table 7: Whether respondent or their organisation would like to collaborate with the Scottish Government on any of the proposed actions

	Yes	No	Don't know	No response
Equalities/advocacy groups (31)	17 (55%)	3 (10%)	2 (6%)	9 (29%)
Public sector (47)	22 (47%)	3 (6%)	13 (28%)	9 (19%)
Other organisations (9)	5 (56%)	-	1 (11%)	3 (33%)
Total organisations (87)	**44 (51%)**	**6 (7%)**	**16 (18%)**	**21 (24%)**
Individuals (29)	6 (21%)	12 (41%)	6 (21%)	5 (17%)
Total respondents	**50 (43%)**	**18 (16%)**	**22 (19%)**	**26 (22%)**

The second part of this question then asked respondents which actions they would like to collaborate with the Scottish Government on, and how.

A total of 61 respondents made comments in response to the second part of Q6. Responses were very diffuse in nature, with (in the main) only a few or smaller numbers of replies nominating each of the particular actions or groups of actions on which they would like to collaborate. Smaller numbers still gave details about how they would like to collaborate on these.

Regarding the education-related actions (1, 2 and 3), a small number of respondents expressed a desire to collaborate on any of these, with an equalities/advocacy organisation looking forward to "continuing to work … on the development of the CLAS and Child Protection data returns". Additionally, a few respondents specified either Action 1 (e.g. a public sector organisation wished to work on "how a Looked After Child is defined and how we can ensure we identify them in our data sets to evidence the impact of our interventions") or Action 3, for instance regarding the provision of support or advice.

A few respondents mentioned collaborating on justice-related actions (4, 5, 6, 7 and 8). Support or advice provision, and community engagement and capacity building were stated in relation to Actions 5, 6 or 8 by a small number of respondents, but without giving further details.

Social security-related actions (9, 10 and 11) were only mentioned a small number of times, almost all in terms of general support or advice. An equalities/advocacy organisation wished "to discuss how we could work together to ensure necessary data is being collected to identify and ensure the right actions are taken to reduce child poverty, particularly amongst the priority family groups identified in the Tackling Child Poverty Delivery Plan". This was also stated in relation to the poverty-related actions.

Larger numbers of responses – a significant minority - discussed collaboration on poverty-related actions (12 and 13). Two equalities/advocacy organisations were

keen to take a role "to ensure necessary data is being collected to identify and ensure the right actions are taken to reduce child poverty, particularly amongst the priority family groups identified in the Tackling Child Poverty Delivery Plan". One other equalities/advocacy group stated they would be happy to provide women's lived experience data surrounding the cost of living. A couple of respondents stated collaboration on Action 12 specifically, with one offering support with food security data. A few focused on Action 13, with suggestions from single public sector respondents involving work with the Scottish Government to assess poverty with a wider set of measures to complement the Scottish Index of Multiple Deprivation (SIMD), and improving poverty measures to include a rural perspective (perceiving that SIMD has limitations in rural contexts).

Equality-related actions (14, 15 and 16) elicited offers of collaboration from a few respondents, mainly to all or any of these, with few details provided. A public sector organisation expressed interest in working with the EEF "to develop a measurement framework to ascertain how we will recognise our success and impact" regarding a shortly to be published set of National Equality Outcomes. A very small number of respondents specified collaboration on particular actions, with one offering to provide their own organisational data in relation to Action 15.

Only a small number offered help with housing and homelessness-related actions (17 and 18), with almost no details given. A public sector organisation suggested collaboration regarding Action 17 relating to HL1 and PREVENT1 data as required.

Larger numbers – a significant minority – specified collaboration in relation to the health and social care-related actions (19 to 24). Apart from general comments about provision of support or advice regarding community engagement, consultations and other evidence provision, there were two mentions by public sector bodies of already working with the Scottish Government on social care workforce statistics and workforce planning, and another comment expressing interest in collaborating on actions relating to Health and Social Care Partnership (HSCP) business particularly to understand intersectionality in a small local HSCP area. Regarding responses about specific actions, an 'other' organisation offered to support, with respect to Action 21, evidence-gathering exercises with a focus on the mental health support needs for victims and survivors of domestic violence and gaps in the current service provision, while two organisations were keen to help provide data relating to women's health. On Action 23, a public sector body would be happy to collaborate with a "Core Dataset for Tier 2 and Tier 3 Weight Management Services for Children/Young People and Adults in Scotland", while for Action 24 an equalities/advocacy respondent advocated a possible role in the Mental Health Inpatient Census review, most applicably in part 3.

Only a small number mentioned transport-related actions (25 and 26), with only one of these giving any details. An 'other' organisation stated they were already collaborating with Transport Scotland, Public Health Scotland (PHS) and the Public Health and Sustainable Transport Partnership. This respondent noted "There are insights from the 16 year period we have been engaged in research in Scotland and from the recent needs assessment work we have undertaken that we would be willing to share".

Small numbers again mentioned the local government-related action (27) and none of these gave any details.

A few respondents mentioned collaboration on the labour market and economy-related action (28). An equalities/advocacy body offered to share information from their own work on the area "…as well as challenges in doing analysis on employment and ethnicity. We would like to see analysis go beyond simple breakdowns of employment rates, inactivity and unemployment". No other respondent gave any details.

Constitutional, international and migration-related actions (29 to 31) were only mentioned a small number of times, without respondents expanding upon this.

The rural and environment-related action (32) only elicited one response. A public sector body said they could be involved in any extension of the scope of the June Agricultural Census to cover gaps in equality data.

Collaboration around the NRS-related actions (33 to 35) was mentioned by small numbers of respondents, although no details beyond generally improving the evidence base were offered. All but one mention cited collaboration on Action 33 specifically.

A significant number of respondents focused their comments on improving the evidence base without mentioning the actions. Single suggestions included:

- collaboration on recommendations impacting on local authority datasets
- defining a national dataset to support any proposed National Equality Outcomes that may arise from the current review of the Scottish Specific Duties that support the PSED
- data gathering discussions regarding the Tackling Child Poverty priority families
- collaborating with ongoing work being progressed through Research Data Scotland (RDS) and PHS on developing and piloting protected characteristics reference datasets through data linkage
- more use to be made of qualitative or lived experience data

A few organisations also mentioned other equality-related data aspects, such as helping improve data quality, reducing the administrative costs of data capture, collaboration to make a more coherent data landscape and making health data more inclusive. A few individuals and equalities/advocacy organisations offered help around gender and/or sex sensitive data collection and usage. Very small numbers offered similar help related to the improvement of disabled or ethnicities-related data (e.g. providing lists of missing data sources from the EEF).

A small number of organisations stated that they were open to suggestions for collaboration or happy to help in any way. However, two public sector bodies queried whether there was resource availability in terms of costs and staff to help with improving evidence at the present time. An individual attending a consultation

event suggested the Scottish Government should provide support for other organisations – such as those in the third sector – to enable them to collect data that could then be shared with other organisations.

The next question asked:

Q7.1: Are you aware of any other organisations, networks or individuals the Scottish Government should collaborate with to improve the equality evidence base?

As shown in Table 8, just under half (45%) of respondents noted they were aware of other organisations, networks or individuals the Scottish Government should collaborate with to improve the equality evidence base.

Table 8: Whether respondent is aware of others the Scottish Government should collaborate with to improve the equality evidence base

	Yes	No	Don't know	No response
Equalities/advocacy groups (31)	8 (26%)	7 (23%)	4 (13%)	12 (39%)
Public sector (47)	19 (40%)	13 (28%)	6 (13%)	9 (19%)
Other organisations (9)	4 (44%)	1 (11%)	1 (11%)	3 (33%)
Total organisations (87)	**31 (36%)**	**21 (24%)**	**11 (13%)**	**24 (28%)**
Individuals (29)	21 (72%)	3 (10%)	3 (10%)	2 (7%)
Total respondents	**52 (45%)**	**24 (21%)**	**14 (12%)**	**26 (22%)**

The second part of this question then asked respondents to say who the Scottish Government should collaborate with and a total of 53 repondents commented.

Most recommended bodies or groups with whom to collaborate, but there were relatively few mentions of particular actions. The most prevalent groupings discussed by a large minority, consisting almost entirely of individuals, were sex-based campaigning groups supporting women, both in general and specifically concerning various issues. By far the most frequently mentioned group – by a significant minority of respondents overall – was For Women Scotland. It was suggested collaboration should be on work to protect women's sex-based rights (regarding health issues, for example), on involvement in legislation relating to how women are defined in law, and on actions that impact on the protected characteristic of sex. Other sex-based campaigning groups supporting women recommended for collaboration by very small numbers of respondents included Sex Matters, Fair Play for Women, The Women's Rights Network, FiLiA and Forth Valley Feminists. Single mentions were made of individual specialists to help with advice on the gathering of all sex-related data. In this context, there were also a small number of mentions of policy group Murray Blackburn MacKenzie in

connection with their expertise in policy-making and equalities, with one respondent citing Actions 1 and 2 as suitable for their involvement.

Equalities organisations, councils, networks and stakeholder groups were advocated by a significant minority of mainly public sector respondents. Very small numbers of mentions were made of each of the following:

- The Scottish Council Equality Network (SCEN), in connection with Action 27 (local government)
- Grampian Regional Equality Council
- The Equality and Human Rights Commission (EHRC), in connection with research and data gathering regarding the Equality actions (14 to 16)
- Fairer Scotland Duty Network

A few mainly public sector respondents advocated centres of expertise in the academic field. Specific single mentions were made of the Universities of Glasgow and Dundee, as well as the Scottish Graduate School for Social Sciences, the latter for linking up with researchers researching equality data. In general these sources were recommended for their expertise in research and understanding of equality data.

Similar numbers suggested collaboration with health organisations, with a very small number of mentions for PHS (e.g. for CAMHS data) and single mentions for the NHS and the Glasgow Centre for Population Health. An equalities/advocacy organisation recommended LGBT Health and Wellbeing in connection with Action 19. Health and Social Care data strategy teams and Public Health Intelligence teams also received single mentions.

Small numbers advocated collaboration with the following:

- local authorities/councils (e.g. COSLA, Social Work Departments, Local Government Benchmarking Framework), for data collection capacity. There were also single mentions for the UK Government and the Welsh Government, noting the latter is currently developing a series of equality evidence units
- social care organisations (SSSC for social care workforce statistics, CELSIS, Who Cares Scotland, Care Experience Group – all in relation to Action 1 - and the Care Inspectorate for collecting data directly from care providers)
- education-related bodies (SQA, GTCS or other professional registration bodies, Skills Development Scotland (SDS), and Northern Alliance and/or other regional variations for the education and child-related actions)
- children and young people-related organisations (Young Scot, the Children's Care and Protection Data Community Scotland (for a range of expertise on families and children and approaches to data collection), the Disabled Children Child Protection Network and the Scottish Children's Reporters Administration (the official statistics provider relating to the Children's Hearing System)

Smaller numbers of respondents recommended collaboration with a variety of equalities-related organisations as follows:

- ethnicity-related (Black Professionals Scotland, CEMVO Scotland (for contact referrals and networks of contacts), the Ethnic Minority National Resilience Network and Black and Ethnic Minority Infrastructure in Scotland (BEMIS)). The Scottish Refugee Council was also mentioned by one respondent
- disability-related (more data through lived experience and an improved evidence base generally through encouraged participation for disabled people; the British Deaf Association and the Royal National Institute for the Blind (RNIB) were each mentioned once)
- LGBT-related (LGBT Youth Scotland, Stonewall Scotland and LGBT Health and Wellbeing)

A small number of respondents advocated more use of qualitative and lived experience data generally, recommending third sector sources.

Finally, single mentions were made (mostly without referring to actions) of the following broad range of organisations:

- Office of Communications (OFCOM) (for surveys or data on internet use)
- Carnegie UK Trust (on the subject of the need for digital inclusion)
- Public Health and Sustainable Transport Partnership (for improvements to equality data)
- ONS - for statistical harmonisation work being undertaken and administrative data research, together with expertise on data linkage
- Administrative Data Research UK (ADR UK) – again for expertise on data linkage which may present significant benefits to the equality evidence base
- NRS - regarding equity of access in relation to cancer trials
- Scottish Policy and Research Exchange (SPRE)
- The Police Scotland Equality Diversity and Inclusion Independent Review Group and National Independent Strategic Advisory Group
- The Scottish Federation of Housing Associations, Glasgow and West of Scotland Forum of Housing Associations, Association of Local Authority Chief Housing Officers and the Scottish Housing Regulator, who collectively developed "Collecting Equality Information: National Guidance for Scottish Social Landlords"
- Scotland's Community of Access and Participation Practitioners (SCAPP) – regarding Action 13

Use of Equality Evidence

The consultation paper noted that 'equality evidence' refers to statistics and research across different themes for age, disability, race/ethnicity, sex/gender, religion, sexual orientation, transgender status, gender reassignment, 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 asked:

Q8.1: How often do you or your organisation use equality evidence?

As demonstrated in Table 9, just under half (46%) of respondents are often using equality evidence and just under a quarter (24%) are using this occasionally. Only small numbers of respondents claimed to rarely or never use equality evidence.

Table 9: Frequency of using equality evidence

	Often	Occasionally	Rarely	Never	Don't know	No response
Equalities/advocacy groups (31)	12 (39%)	10 (32%)	1 (3%)	-	2 (6%)	6 (19%)
Public sector (47)	29 (62%)	12 (26%)	-	-	-	6 (13%)
Other organisations (9)	5 (56%)	2 (22%)	-	-	-	2 (22%)
Total organisations (87)	**46 (53%)**	**24 (28%)**	**1 (1%)**	**-**	**2 (2%)**	**14 (16%)**
Individuals (29)	7 (24%)	4 (14%)	2 (7%)	6 (21%)	7 (24%)	3 (10%)
Total respondents	**53 (46%)**	**28 (24%)**	**3 (3%)**	**6 (5%)**	**9 (8%)**	**17 (15%)**

Respondents who answered 'often', 'occasionally' or 'rarely' were then asked a series of questions, the first of which related to which equality evidence sources they or their organisation use, and 80 respondents provided sources.

Most of these used a combination of several different sources. The largest numbers (a large minority consisting predominately of public sector organisations) said they used Census data or Census outputs, occasionally specifying Scotland's Census data from 2011. Slightly smaller numbers, though still a large minority almost entirely consisting of public sector or 'other' organisations, used the Scottish Government's EEF. Similar numbers, though this time consisting of roughly equal numbers of public sector and equalities/advocacy organisations, used publications, reports, data and statistics published on the Scottish Government website.

A significant minority from the range of organisation types sourced evidence from the SHS. Smaller numbers (a few respondents each) mentioned information usage

from the Scottish Crime and Justice Survey (SCJS), Scottish Health Survey (SHeS) and the Scottish Social Attitudes Survey (SSAS).

Among other large-scale data sources, data produced by the ONS was mentioned by a significant minority, with the Annual Population Survey (APS) and the OTUS specifically mentioned. A few organisations quoted SIMD, and similar numbers other NRS data such as population projections and publications.

A large number of respondents mentioned a wide range of subject-specific sources. A few respondents each referred to the following:

- employment data (equal opportunities surveys, employee surveys, My Job Scotland website, Scottish Social Services Council's (SSSC's) workforce data site). Very small numbers mentioned Skills Development Scotland statistics (e.g. Datahub, apprenticeship statistics, Regional Skills Assessment)

- NHS sources (NHS 24, services, workforce reports, Scottish Workforce Information Strategic System (SWISS) system for staff, Electronic Employee Support System (eESS) reports, national health board reports, health indexes). Additionally, a few respondents mentioned PHS sources (Observatory (ScotPHO), PHS publications and reports)

- child-related (CLAS, Child Protection returns, Looked after Children, Together (Children's Rights), United Nations data relating to children's rights)

- education-related (Scottish Education Management Information System (SEEMiS), attainment data, qualification uptake data, Pupil Census, Teacher Census, Scottish Schools Adolescent Lifestyle and Substance Use Survey (SALSUS))

- social security–related (Social Security Scotland: stats, client diversity and equalities analysis, and Department of Work and Pensions: Stat-Xplore (benefits statistics)).

A small number of responses mentioned housing-related sources (e.g. Homelessness in Scotland statistics and housing waiting list information).

Among other organisations quoted as evidence sources, Close the Gap was mentioned for its research reports by a few respondents, mainly public sector bodies. Small or very small numbers of mentions were also made of the following:

- Coalition for Racial Equality and Rights (CRER)
- Joseph Rowntree Foundation (JRF) (for research reports)
- EHRC (e.g. reports "Is Britain Fairer?" and "Is Scotland Fairer?")

A large minority of respondents stated generic tools by which they obtained information, as well as specific sources for evidence. Mentions were made of focus groups, interviews, surveys, lived experience data, statistical analysis, and sources for local and regional data. Additionally, a large minority of organisations said they generated their own internal information and data by using the aforesaid tools, as well as employee surveys and forms, for understanding their diversity and equalities situation with respect to their employees and service users.

A few respondents stated academic (journals, research, etc.) or third sector sources (reports, literature, etc.) for evidence without giving further details. Engaging with equality groups was mentioned by two respondents.

Finally, single respondents noted evidence from UK Government data, the Public Bodies Equality Evidence Toolkit, and Scotland's Gender Equality Index.

Following on, the next question asked:

Q8.3: How do you or your organisation use equality evidence?

A total of 77 respondents (almost all of them organisations) replied to this question. Most of these stated several different uses. The main use, given by nearly half of respondents, was to shape decision-making, strategic planning or inform policy for their own organisation or sector of interest. A few respondents said the evidence was used specifically to shape equalities policies and plans, and a small number noted its value in prioritising action areas. A large minority used equality evidence in reports (e.g. equality monitoring, mainstreaming reports or case studies), papers, consultation responses or annual or statistical publications. Slightly smaller numbers of mostly public sector organisations used the evidence to inform EQIAs or to structure their EQIA process. Similar numbers (almost all public sector organisations) used the evidence to monitor, identify, develop, set or review Equality Outcomes, as exemplified below:

> "The data tells us where we are lacking, for example in our 2021 Report we noted that our Ethnic minority rep…, is low in comparison to the population in Central belt, hence our EQ Outcome to increase our rep by 4% by 2025. We have already achieved an increase since our last EQ report in April 2021 from 1.5% to 2.5%" (Public sector)

A large minority of mainly public sector organisations said equality evidence was used to ensure fairness regarding diversity and inclusion or to ensure no groups (e.g. women, LGBT) were underrepresented in their sector or organisations. Further points were made about identifying access barriers and eliminating discrimination. A few organisations pinpointed its use for recruitment purposes (e.g. advertising job opportunities to underrepresented groups or reviewing recruitment processes).

A large minority of organisations said they use the evidence to monitor trends or for tracking and benchmarking purposes; for instance, comparing local or organisational trends to national or whole population trends, tailoring internal or service user demographics to regional demographics, or measuring changes over time. Slightly smaller numbers said the evidence was used to gain insights or inform understanding of particular groups or to identify their needs. Similar proportions noted its use for academic or analytical research purposes, without going into much detail. Two equalities/advocacy groups used it for understanding gaps in data.

A significant minority (mainly consisting of public sector bodies) highlighted the use of evidence in improving services, assessing service delivery or improving ways of working, for instance in building capacity. A small minority alluded to its use in informing particular projects and programmes, such as in creating educational resources, performing engagement activities and doing due diligence on potential projects.

Similar numbers (largely a mix of public sector and equalities/advocacy organisations) cited awareness-raising uses of equality evidence. Instances were given of disseminating information to stakeholders, community partners and elected members via talks or seminars, with a couple of mentions of uses for Freedom of Information (FOI) requests. A few stated promotional purposes, such as public education work and identifying target audiences.

A few organisations stated a role in complying with regulations, such as those supporting the PSED or the provision of statutory assessments. Very small numbers mentioned uses for training and educational purposes (e.g. diversity and inclusion training) or to support funding or grant applications.

The next question asked:

Q8.4: How do you or your organisation usually access equality evidence?

A total of 66 responses were received to this question. Most answers were general in nature. Many responses reflected those given earlier at Q8.2. The highest numbers – a large minority - cited web or online access. Slightly smaller numbers of mostly public sector bodies claimed to use their own internal sources in the form of research, reports, data, publications, equality monitoring forms and employee and recruitment statistics.

A significant minority of public sector and equalities/advocacy organisations cited access via the Scottish Government website. The EEF was quoted by a few respondents. The Scottish Government was also mentioned a few times in connection with publications, databases and specific requests.

A significant minority of respondents stated access through other public bodies, including local authorities, the NHS, PHS, the UK Government, the police, Social Security Scotland and the SQA.

Accessing equality evidence via Census information was stated a few times, although a respondent attending a consultation event noted that Census 2011 data is considered too old by some people. There were a small number of mentions for other specified datasets including SIMD, the Scottish Longitudinal Study, the SHS and the SCJS. Other specific sources were the ONS (small numbers), NRS, MyJob Scotland for public and third sector job information and the Joseph Rowntree Foundation (all very small numbers).

Additionally, there were a significant number of mentions of external research, without giving much detail; the third sector and policy organisations were quoted as sources for this.

Similar numbers cited direct or face-to-face engagement with stakeholders such as equality groups, visitors and membership organisations. A few respondents gave general mentions of published information, sources, reports or research, and of academic sources such as journals. A small number cited access through direct contact, networking or collaboration with other organisations.

The next question went onto ask:

Q9.1: Do you face any barriers to using equality evidence?

As shown in Table 10, almost two thirds of respondents (65%) said they experienced barriers to using equality evidence.

Table 10: Whether barriers are faced in using equality evidence

	Yes	No	Don't know	No response
Equalities/advocacy groups (31)	18 (58%)	4 (13%)	2 (6%)	7 (23%)
Public sector (47)	36 (77%)	3 (6%)	1 (2%)	7 (15%)
Other organisations (9)	5 (56%)	1 (11%)	- (0%)	3 (33%)
Total organisations (87)	**59 (68%)**	**8 (9%)**	**3 (3%)**	**17 (20%)**
Individuals (29)	16 (55%)	5 (17%)	4 (14%)	4 (14%)
Total respondents	**75 (65%)**	**13 (11%)**	**7 (6%)**	**21 (18%)**

Respondents who claimed to experience barriers to using equality evidence were then asked to provide information on the barriers faced, and 83 respondents provided a response. Most comments alluded to concerns about available equality evidence not being relevant to needs.

The most often quoted difficulties given in accessing the required equality evidence (quoted by a significant minority of respondents across all organisation types) were inconsistency of approach and non-standardised equality evidence, particularly regarding data collection. Examples of issues encountered were the variety and inconsistency of data collection methods used by organisations, differing data formats resulting in data incompatibility, and inconsistencies in language and categorisation, making it difficult to know which of the choices to use. There were a few calls for standardisation of data reporting.

A smaller but still significant minority reported difficulties finding the required data, information or evidence, or in finding the required breakdowns. Similar numbers

pointed to resource limitations in terms of time needed to analyse data and to identify and interpret evidence.

A few respondents each alluded to the following access difficulties:

- problems with the EEF (e.g. lack of user friendliness, difficulties accessing the required evidence, the website displaying as not secure, search tools bringing up unnecessary links or documents, acting at too high a level to reliably inform impact assessments and not having the data needed)

- having to access multiple sources to obtain the required information (e.g. multiple requests being needed to obtain similar information) with suggestions advocating a one stop shop or centralised system

- permissibility barriers to accessing evidence (e.g. GDPR, data protection and confidentiality issues, and data not being made available by public organisations)

An equalities/advocacy group pinpointed the following issue:

> "…some public bodies have incorrectly interpreted the introduction of the EU General Data Protection Regulation (GDPR) as prohibiting them from asking service users their sex or gathering wider equalities data relating to their employees. Similarly, within the context of skills and training programmes, GDPR has been used as a reason for why public bodies or providers are unable to gather data on participants. In implementing this strategy, the Scottish Government should provide clear guidance to Government departments and public bodies around what is relevant and possible when gathering equalities data."

The largest numbers of respondents overall (a large minority) pointed out general gaps in equality data. Issues raised included data not existing, not being up to date, a need for qualitative data, a need for more research by academia and the third sector and a lack of longitudinal data. Similar numbers of organisations pinpointed gaps in or limitations to data in relation to certain equality characteristics. These included LGBTIQ people, older age groups, disabilities (e.g. whether people with fluctuating impairments consider themselves disabled), gender-sensitive data and Polish ethnicity.

A large minority perceived an insufficiency of disaggregated data in that breakdowns were too broad and not specific enough for their needs. Examples included a lack of disaggregation by ethnicity (e.g. white vs minority ethnic not being deemed as useful categories), disability (learning disabilities) and sex. A significant minority pointed to a lack of intersectional data or limitations in exploring intersectionality, with a lack of sample and data recording limitations blamed. A further significant minority of mainly public sector organisations perceived a lack of data specific to regional, local or rural areas (e.g. at local authority level). Similar numbers pointed out a lack of data linking to non-protected characteristics or across sectors, datasets and policy areas. Many sectors were exemplified as follows: lone parents, Gaelic speakers, large families, those with babies, service

users and non-users (e.g. NHS), participation in sport, neurodiversity, impact of changes (such as free eye examinations by equality group), housing, welfare recipients, social care, digital exclusion, poverty-related areas and modal travel.

A high degree of non-response was also highlighted as an issue by a significant minority of mainly public sector respondents. Public or staff reluctance to provide personal information was cited as leading to incomplete or non-returns of equality monitoring forms. This was perceived as being a result of a lack of understanding over how the information would be used and nervousness about individuals being identified. The result was either only a partial understanding of issues or unreliable findings.

Slightly smaller numbers of respondents cited problems caused by definitional issues making evidence unreliable. Examples were: different categories being used for ethnicity and disability classifications (the latter owing to differing medical and social models), male sex respondents being able to answer questions about women's health because they are based on gender, and 'care experienced' vs 'in care' definitions leading to incomplete datasets. Similar numbers pinpointed sex and gender conflation problems preventing the proper monitoring of sex; inconsistencies were perceived with the Equality Act 2010, and an individual perceived that the Census encouraged respondents to include gender in place of sex rather than in addition to it.

An equalities/advocacy organisation summed up many of the aforementioned points as follows:

> "A recent example of some of the routine barriers faced comes from attempts to undertake an Equalities Impact Assessment (EQIA) of the Scottish Government's Towards Transformation plan, published in 2021. The intention of the EQIA was to identify areas of multiple discrimination, and understand how Towards Transformation might help or hinder equality of opportunity for different groups. However, within this process it became clear that it was not possible to look in any detail at the experiences of people with the majority of the protected characteristics for numerous reasons:
>
> • Lack of systematically collected equalities data; Lack of disaggregation of learning disability status within data;
>
> • Lack of academic studies looking at the experience of people with learning disabilities and other protected characteristics;
>
> • People with learning disabilities, and organisations working with people with learning disabilities are tired of telling their stories repeatedly when nothing changes for them in the short term."

A couple of equalities/advocacy respondents perceived an issue with incorrect data recording and gathering. One of these disclosed the following example:

> "HBAI codes everyone in the household as the same ethnicity as the head of household and does not make clear the amount of financial

autonomy individuals have within a household"
(Equalities/Advocacy)

A significant minority (mainly public sector organisations) saw problems relating to insufficient sample size, with a few recommendations for conducting sample boosts or pooling data over different years to compensate. Particular issues noted were not enough minority group representation, sample sizes being too small for robust reporting or meaningful analysis, and disaggregated analysis being challenging. Characteristics identified as being particularly vulnerable in this respect included transgender status, sexual orientation, religion and disability.

The next question then asked:

Q10.1: 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)

As shown in Table 11, views were broadly split between those able (34%) and unable (31%) to make decisions because of a lack of equality evidence.

Table 11: Whether decisions cannot be made because of a lack of equality evidence

	Yes	No	Don't know	No response
Equalities/advocacy groups (31)	12 (39%)	7 (23%)	3 (10%)	9 (29%)
Public sector (47)	13 (28%)	21 (45%)	7 (15%)	6 (13%)
Other organisations (9)	3 (33%)	3 (33%)	1 (11%)	2 (22%)
Total organisations (87)	**28 (32%)**	**31 (36%)**	**11 (13%)**	**17 (20%)**
Individuals (29)	8 (28%)	8 (28%)	6 (21%)	7 (24%)
Total respondents	**36 (31%)**	**39 (34%)**	**17 (15%)**	**24 (21%)**

Respondents who claimed to experience barriers to using equality evidence, were then asked to provide information on which questions they are unable to answer and why those questions are important to answer. A total of 51 respondents provided commentary.

The most frequently stated mentions (a large minority) were general comments about decisions being able to be taken while recognising some equality information may be missing in doing so, resulting in a lack of optimal decision-making. Points were made about enhancing evidence to improve this state of affairs (i.e. to enable decision-making to be more reliable and transparent). A significant minority reported that service and activity planning, development and delivery were more challenging: targeting of resources and approving expenditure towards diversity

issues or those in greatest need, along with making or demonstrating changes was deemed to be more difficult.

The following data-related restrictions were each raised by a few respondents:

- lack of ability to do intersectional analysis (e.g. between differing equality groups)
- a lack of baseline data making it difficult to measure reductions or exacerbations in inequalities or have a sense of how diverse an organisation or community is
- negative impacts on the quality of Equality Impact Assessments (EQIAs), with a lack of data on all protected characteristics resulting in a lack of robustness. A very small number of organisations went on to say that this would have knock-on effects on credibility and policy development

A small number of organisations talked of having to gather their own data which does not exist elsewhere, in order to feed into their own specific strategies, policy development and EQIAs. There were further comments about the resulting expense in terms of time and resources.

Very small numbers of respondents raised issues about outdated data and evidence (e.g. Scotland's Census 2011, EHRC document 'Is Scotland Fairer?') and missing data (lack of provision of sensitive data, consultation fatigue of minority groups).

A large number of specific areas in which decision-making was deemed to be difficult or not possible were discussed, albeit by only a few respondents in each case, with examples of where evidence in perceived to be lacking. These are detailed below:

- sex vs gender conflagration issues (e.g. problems with ambiguity in the use of the word 'gender', self-identification of sex meaning the impact of sex on pay or service provision cannot be assessed adequately)
- race or ethnicity, mainly through a lack of data breakdowns or consistent data collection (e.g. comparing white with non-white ethnicity not being sufficient to tell which ethnic groups face the greatest barriers; access to – and utilisation of – legal and welfare benefits advice by minority ethnicities compared with the general population; rates of application for citizenship by minority ethnic groups and refugees; housing and homelessness linkage; morbidity and mortality rates; immunisation; antenatal care; cervical and breast screening; data on earnings, under-employment and job satisfaction not being available by region and ethnicity)
- local or regional areas (e.g. for the Highlands and Islands)
- disabilities (e.g. general lack of data breakdowns; costs of disabilities; disparities in travel modes between disabled and non-disabled)

- representativeness of workforces, applicants and the labour market (e.g. ability to attract people from all backgrounds; job type breakdowns; full time vs. part time work)

- health (e.g. mental health access; COVID-19)

Small numbers of respondents perceived the following other areas where decision-making was described as impacted:

- poverty (e.g. child poverty priority groups; SIMD not accurately reflecting poverty in rural communities; perceived lack of a free school meal dataset; equality analysis not being available for all priority groups generally)

- sex (e.g. reasons for a disproportionate number of females accessing parent support services; split of household resources in mixed sex relationships)

- care/social care (e.g. assessing which children are most in need of care and support; assessing the difficulties people have in accessing social care services; evidence on carers support and analysis of uptake of carer benefits)

Finally, very small numbers pinpointed decision-making being impaired in the areas of gender (e.g. in discussions of work, ethnicity and disability), age (e.g. for funding applications), education and sexual orientation.

Equality evidence collection

The next question in the consultation paper asked:

As Table 12 shows, almost two thirds (61%) of respondents produce equality evidence sources.

Table 12: Whether organisation produces any equality evidence sources

	Yes	No	Don't know	No response
Equalities/advocacy groups (31)	19 (61%)	4 (13%)	-	8 (26%)
Public sector (47)	39 (83%)	-	1 (2%)	7 (15%)
Other organisations (9)	7 (78%)	-	-	2 (22%)
Total organisations (87)	**65 (75%)**	**4 (5%)**	**1 (1%)**	**17 (20%)**
Individuals (29)	6 (21%)	13 (45%)	5 (17%)	5 (17%)
Total respondents	**71 (61%)**	**17 (15%)**	**6 (5%)**	**22 (19%)**

Respondents whose organisations produce any equality evidence sources were then asked to say which sources they or their organisation produce.

A total of 71 respondents answered this part of the question. Almost all of these intimated that they generated their own data as evidence. A significant minority of mainly public sector organisations indicated that they produced or generated data on their own workforces or recruitment data (e.g. on NHS staff). A large minority said they generated data on other stakeholders such as communities, service users, patients and tenants.

Respondents also in some cases detailed the equality characteristics for which they generated evidence. The largest numbers (a significant minority overall) said they produced data on sex and gender, with a small number generating this in the context of women specifically. Similar numbers claimed to generate evidence on ethnicity, while a few respondents each specified age or disability-related data; others said they produced data on some or all of the protected characteristics without specifying which ones. A few public sector and equalities/advocacy respondents specified other types of data produced (e.g. postcode/geographical/urban/rural location data, deprivation data, health data and data on single parent families).

A few respondents noted that they produced their own data as a legal or statutory obligation (e.g. evidence on compliance with the PSED). Similar numbers cited producing or sharing Equality Mainstreaming Reports (e.g. to help with the Equality Data Improvement Programme or internal equality data improvement programmes).

Many respondents chose to detail the methods by which they gathered their equality evidence. The greatest numbers – a large minority – conducted surveys with their stakeholders, such as criminal and civil legal applicants, patients (e.g. for generation of long COVID evidence) and tenants. Smaller but still significant numbers of mostly equalities/advocacy and 'other' organisations reported generating data from qualitative or lived experience sources. Focus groups (e.g. to help develop equality commitments) were mentioned by similar numbers, as well as more general engagement with equalities and community groups. A few respondents conducted consultations. There were very small numbers of mentions of events, workshops, and roadshows as a means of generating evidence, of using face to face or telephone interviews, and of using panels.

A large minority of respondents from all organisation types said they produce or publish their own research, reports and papers[1]. A few published specific data (e.g. on gender pay gaps).

A similarly large minority of mostly public sector organisations said they develop their own equality strategies, plans, policies and recommendations, at least in part from their own research and internally-generated evidence.

A significant minority of mainly public sector organisations conducted their own analysis of existing information or evidence. Examples included overarching views of existing sources, deep dives of aggregated equality data, and interpreting Scottish Government evidence and statistical analysis.

Slightly smaller numbers said they commissioned independent research and analysis, with a few stating they engage in research collaborations with other bodies.

The final question in the consultation paper asked:

Q11.3: Are there any barriers to you or your organisation collecting more equality evidence?

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[1] As well as annual equality reports, some examples included:

"My Life in the Highlands and Islands" (Oct 2022),

"How Fair is North East Scotland" (2021, 2018),

"How Brexit Impacts EU Citizens' Mental Health And Wellbeing" Research Findings (2019),

"Mental health and suicides amongst Polish men in Scotland" (2020),

"An Unequal Burden: How Covid-19 has affected women's employment, financial security and unpaid work" (2022),

"Equality and Sport Research" 2020 (independent research to update, refresh and grow equality evidence of who participates in sport)

As Table 13 shows, half (50%) the respondents noted they or their organisation face barriers in collecting more equality evidence.

Table 13: Whether organisation faces barriers in collecting more equality evidence

	Yes	No	Don't know	No response
Equalities/advocacy groups (31)	9 (29%)	6 (19%)	4 (13%)	12 (39%)
Public sector (47)	36 (77%)	3 (6%)	1 (2%)	7 (15%)
Other organisations (9)	6 (67%)	1 (11%)	-	2 (22%)
Total organisations (87)	**51 (59%)**	**10 (11%)**	**5 (6%)**	**21 (24%)**
Individuals (29)	7 (24%)	7 (24%)	6 (21%)	9 (31%)
Total respondents	**58 (50%)**	**17 (15%)**	**11 (9%)**	**30 (26%)**

All those respondents who claimed they or their organisation face barriers in collecting more equality evidence were asked to provide more information about these; and 65 respondents answered.

A wide variety of barriers were described, though a minority of these appeared to be related to problems with equality evidence as a whole rather than barriers to collection faced by organisations that produce their own data.

An assortment of internal resource constraints were pinpointed by a majority of respondents. There were widespread complaints about a lack of capacity to gather representative quantitative data and therefore having to rely on secondary or existing data sources, or data collection and analysis being too resource intensive, particularly for small or third sector organisations.

Significant minorities (of mostly public sector respondents) each focused on the following issues:

- costs and funding constraints (e.g. limited research budgets, costs of data capture, storage and analysis)

- lack of internal expertise (e.g. guidance needed on analysis methods, what needs to be collected, standard questions to use, how to boost sample, data format training and knowledge about best practice)

- lack of systems or ability to invest in information systems or technology support (e.g. costs of software tool updates (SEEMiS, Insight), analysis software requirements and incompatibility of data formats with internal software)

Time constraints were also mentioned by a few respondents, with an equalities/advocacy organisation viewing deadlines as being too tight to complete meaningful data collection.

Many organisations alluded to the nature of the evidence itself as being a barrier. Problems relating to a lack of sensitive information disclosure were cited by a large minority of mostly public sector respondents. As in earlier questions, a lack of trust or awareness of the value of data were each alluded to as significant barriers to disclosing information on topics like ethnicity and disability. Low survey or form completion rates were also mentioned by a small number of respondents, as well as challenges in reaching the groups that need to be heard the most.

Slightly smaller numbers pointed to insufficient sample numbers preventing the carrying out of robust, intersectional, regional or local data analysis. Category breakdown issues (e.g. in measuring variations between minority ethnic groups, and disability breakdowns being based on the medical model rather than the social model) were noted in a small number of comments. A lack of equality data concerning specific sectors was also described by a significant minority: financial services, sports participation, poverty statistics, and transport and travel behaviour were all stated as lacking in data for some characteristics, amid general accusations that not enough data was being produced by public sector.

A lack of consistency and coherence amid a fragmented data landscape was cited as a barrier by a large minority. Problems arose from attempting to join up data, reporting processes, from the use of multiple data sources and formats, issues relating to the same data being collected from individuals at different times, benchmarking difficulties and the use of non-standard definitions or terminology. One example is given below:

> "There is an inconsistency in guidance we have been advised to follow - Collecting Equality Information: National Guidance for Scottish Social Landlords developed in partnership by the SFHA, GWSFHA, ALACHO and the SHR – and the data we must collate via the HL1/HL3/Prevent 1. …We have started to collate data in some service areas in accordance with the Collecting Equality Information: National Guidance for Scottish Social Landlords. However we have not been able to extend this to other service areas since we must be able to complete the necessary Scottish Government returns which don't have the same level of detail. We are currently having to use resources to manually change errors which this creates." (Public Sector)

Recommendations were made for aligning systems for datasets (e.g. health and social care systems) and introducing shared information platforms.

A few respondents also noted issues with the reliability and quality of data. When discussing a need for staff training in data recording of protected characteristics, a public sector organisation said:

> "These characteristics may be 'administratively assigned' rather than self-assigned and if these data are not collected sensitively and appropriately, it becomes very difficult to measure discrimination and uptake (or not) of services by key populations" (Public Sector)

Similar numbers perceived that barriers can be created by GDPR or governance concerns, exemplified by needs to obtain consents where pupils are involved and consideration requirements for the collation, storage and use of data.

Finally, a small number of respondents made reference to data accessibility problems, including language barriers in accessing questionnaires or surveys.

Additional comments

Some organisations (13) provided additional information as part of their response. Most of these gave a general outline of their functions and commitment to equality and diversity (e.g. the establishment of an Equality Advisory Group).

General support for progressing the Scottish Government's Equality Evidence Strategy was also voiced without specifying either the 2023-25 strategy or the old 2017-2021 strategy, along with requests for investment in analytical capacity, to increase the availability of intersectional data and data disaggregation, and to address data deficiencies in some of the protected characteristics. A few respondents also urged the alignment or streamlining of all research and data in terms of terminology, indicator consistency and the general coherence of the evidence base.

A small number of respondents advocated the importance of equality having a role in the protection of human rights, for example robust data collection enabling monitoring for evidence of discrimination. Very small numbers were in favour of early engagement in processes such as sharing data and embedding good practice in data gathering. Two equalities/advocacy organisations noted that care should be taken to comply with international and UK agreements on data collection and use, one of these mentioning commitments made under the newly ratified Istanbul Convention. There were also a couple of further comments about sex and gender being conflated throughout the proposal.

There were a couple of single requests as follows:

- to consider Gaelic speakers as an equality variable
- to raise the profile of the EEF

Finally, a public sector respondent observed that appropriate use of the existing Freedom of Information statutory framework would help strengthen the Equality Evidence Strategy, perceiving that this would enable timely access to equality data in the public interest.

Appendix 1: Organisations responding to the consultation

Equalities/Advocacy organisations
Generations Working Together
Bridges Programmes
Long Covid Kids
Redress Scotland
Equality Here, Now
Scottish Women's Convention
Inclusion Scotland
VOX Scotland
Coalition for Racial Equality and Rights
Joseph Rowntree Foundation
Age Scotland
Scottish Women's Budget Group
CEMVO Scotland
Close the Gap
Paths for All
Zero Tolerance
LEAP Sports Scotland
CFINE
LGBT Youth Scotland
Child Poverty Action Group in Scotland
Scottish Feminist Network
Living Streets Scotland
Scottish Prison Service
The Scottish Commission for People with Learning Disabilities
For Women Scotland
Equality and Human Rights Commission
CELCIS
Mobility and Access Committee for Scotland
Scottish Women's Aid
One Parent Families Scotland
Engender

Public sector
Dumfries and Galloway Council
NHS Grampian
North Lanarkshire Council
Stirling Council
Registers of Scotland
NHS Ayrshire and Arran
Aberdeenshire Council
NHS 24
Food Standards Scotland
Scottish Fire and Rescue Service
Public Health Scotland

Scottish Legal Complaints Commission
Scottish Borders Council
VisitScotland
Scottish Funding Council
Renfrewshire Health and Social Care Partnership
Audit Scotland
Scottish Ambulance Service
NHS Greater Glasgow and Clyde
National Library of Scotland
Scottish National Investment Bank
Historic Environment Scotland
NatureScot
Transport Scotland
NHS Education for Scotland (NES)
SPA
Poverty and Inequality Commission
Sportscotland
Scottish Water
Children's hearings Scotland
Inverclyde Council
Skills Development Scotland
Highlands and Islands Enterprise
West Dunbartonshire Health and Social care partnership
Education Scotland
Scottish Information Commissioner
Care Inspectorate
The Scottish Courts and Tribunals Service
The Scottish Legal Aid Board
Bòrd Na Gàidhlig
Moray Council
Independent Living Fund Scotland
Leadership and Talent Management, Health Workforce, Scottish Government
Moray Council
South of Scotland Enterprise
The City of Edinburgh Council
Police Scotland

Other organisations
The Glasgow Centre for Population Health
Royal Botanic Gardens Edinburgh
National Galleries of Scotland
Strathclyde Partnership for Transport
Feniks. Counselling, Personal Development and Support Services Ltd
Grampian Regional Equality Council (GREC)
The Law Society of Scotland
The Health and Social Care Alliance Scotland (the ALLIANCE)
Scottish Human Rights Commission