Contributing to systemic change through building anti-racism into reporting and accountability mechanisms: a review of process within Scottish Government.

Contents

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Led by the Anti-Racism Interim Governance Group (AIGG) and supported by the Permanent Secretary reporting June 2023.

Like many progressive jurisdictions, Scotland has finally acknowledged and accepted all the evidence which indicates that systemic, structural, organisational racism is a key mechanism that creates and recreates the inequity for those racially minoritised in society ([ERG 2020](#)).

— Over the last 20 years, there have been **39 policies** related to "race" equality in Scotland with **817 commitments and actions** (CRER 2021). Despite this, minimal progress has been made due to little understanding of how racism functions in policy processes and a lack of accountability in implementation because the systems have not incorporated a fit for purpose understanding of how racism functions in these processes themselves.

Rethinking accountability is building anti-racism practice and the AIGG thanks all involved.

Anti-racism contributes to addressing systemic racialised inequity. Anti-racism as actions and processes and rethinking of "business as usual" has by and large been overlooked or misunderstood in systemic processes. In short, current policies and policy processes have sought to create and seek so called "race equality" but not focused on addressing the systemic processes and mechanisms which create racialised inequity.

The intention is that this accountability process and report are a tool for reflection on how the system reports to itself. Undertaking that reflection, alongside the review produced in this report will enable a better understanding gaps in the delivery of recommendations and how systemic anti-racism within accountability processes can become enacted.

This process (explained below) and report are ultimately a tool to support Scottish Government delivery, one that will identify systemic challenges and barriers to action and help us to achieve meaningful systemic change. We view it as anti-racism practice becoming operationalised.

Introduction

The [Anti-Racism Interim Governance Group](#) (AIGG) role April 2022-September 2023 in relation to [the Race Equality Immediate Priorities Plan](#) (IPP) is to provide independent oversight and contribute to reviewing the internal processes that hold Scottish Government accountable for progress against the actions within the IPP.

As part of their commitment to this process, through direct endorsement by the then Minister, Christina McKelvie, the AIGG aims to determine and agree the required National Anti-Racism Accountability and Oversight infrastructure for Scotland. The AIGG approached the Permanent Secretary and senior colleagues in Scottish Government and asked to be given the opportunity to review the systems of recommendations and reporting itself as well as review progress in a more traditional outcomes focused way.

This approach was agreed by the Permanent Secretary and the AIGG developed a series of Accountability Questions [MS Forms link](#). When answered by staff in the spirit of how the questions and reflections were intended it provided the potential for data and insights that could help contribute to an anti-racism intersectional analysis of progress or lack of progress. This contributes to the potential for transformative systemic change.

Addressing systemic racism means investigating the processes and policies that quietly host the reinscribing of systemic inequity.

The approach and the opportunity to review the process itself has been modelled in part on the success of the National Advisory Council on Women and Girls' (NACWG) accountability process first initiated in 2022.

The AIGG are building this reporting mechanism to enable the Scottish Government to recognise the implementation gap between formally agreed recommendations and accountable actions/delivery which make meaningful change for racialised communities. The system needs to better understand how work is being delivered within Scottish Government and beyond to support successful delivery.

There is learning that will be taken from this first engagement with accountability and auditing of anti-racism related interventions and policy delivery. The forthcoming Anti-Racism Observatory for Scotland will be leading on developing this methodology to work competently for communities as well as the public institutions providing responses.

The Scottish Government's approach to anti-racism delivery and the future Anti-Racism Observatory for Scotland (AROS):

The AIGG are building the accountability mechanism explained in this report to ensure that the forthcoming AROS can build from strong foundations and to support it establishing its future relationships with the Scottish Government and wider public institutions.

It is envisaged that the AROS will be a core space of accountability on anti-racism delivery and endeavours across policy areas in Scotland. Indeed, the responses to the accountability survey have further evidenced the need for the AROS, particularly in relation to lived experience input, anti-racism skills building and analysis and disaggregated data.

It is hoped that the AROS and Scottish Government build a relationship which is based on transparency, public accountability, and a joint commitment to progress anti-racism in Scotland. The AROS will be using the learning from the accountability process and others being conducted by other working groups or commissions to build an annual accountability process which will initially focus on the Scottish Government and, as the AROS grows, reach more public institutions.

Crucially, the AROS will be building "community-owned" accountability processes and accountability skills to enable communities and grassroots groups to do this accountability engagement themselves and to act as a way to redistribute power to the places it should always have been: with the public who experience systemic marginalisation and racialisation.

The Scottish Government will be reviewing the IPP (Immediate Priorities Plan) and the Race Equality Framework (REF). The AIGG recommends that this is done with a full range of diverse stakeholders and with lived experience expertise from grassroots community organisations directly. It is also recommended that an accessible and clear strategy is taken forward which does not replicate the shortcomings of the IPP which effectively created an exceptionally long and convoluted list of actions which are difficult to trace and therefore assess on progress.

The REF and IPP should be reviewed and scrutinised on an ongoing basis by a full and diverse range of stakeholders and grassroots groups. These stakeholders can and must include the forthcoming AROS. However, we would recommend that this is not simply another working group which reviews or signs off abstract KPIs and brief updates. Instead, this group must be more creative, meaningful, and astute in identifying ways in which

accessible accountability can take place and how progress can be scrutinised meaningfully to ensure competent implementation and system change.

Scotland needs to move beyond the continuous cycle of setting up working groups, publishing recommendations, and setting up more groups to discuss the very same recommendations. This cycle of inaction is a mechanism of systemic racism. Adequate resourcing, capacity building and competent implementation and accountability must be the focus. The Anti-Racism Observatory for Scotland will play a leading role in making this happen.

Section 1 – the landscape this accountability work was delivered within:

Setting up the space for accountability to take place:

In order for this accountability process to be responded to positively and to deliver what was sought, the AIGG, took a considerable length of time meeting with Scottish Government officials, developing guidance and working with the secretariat to develop internal buy-in. It should be noted that more groundwork was required than had been anticipated by the AIGG.

Directors received a note from Director Generals, regarding the accountability process to ensure that Directors were sighted on the process and could engage with their teams through the accountability period. There were a series of permissions and encouragements required internally to help staff feel confident about how to engage and how "honest to be" in reporting; appreciating their role of speaking as individuals or as "representatives" of the Scottish Government to an external body.

Senior staff who had already undertaken a similar process with the First Minister's National Advisory Council on Women and Girls reflected on their role and the permissions they needed to give to staff to go beyond traditional ways of reporting. This learning was then applied to this iteration of accountability methodology.

Two workshops with the AIGG Co-chairs, Professor Ima Jackson and Talat Yaqoob, were organised to discuss and reinforce the rationale and necessity for the questions to be answered in the way in which the AIGG have produced them.

Why an accountability method is needed:

The Immediate Priorities Plan (IPP) has been scrutinised (2021 – 2023) through an internal quarterly update which requires policy areas to update on progress of IPP recommendations and provide a brief summary of current work. However, the AIGG and Scottish Government itself felt this process did not provide an accountability mechanism that fully and meaningfully assessed the effectiveness of the delivery of the IPP, especially lacking in depth, clarity, and robustness in the process of evaluating what action is taken

The process is largely to track key milestones, when what is required is a space to discuss challenges in delivery and limitations and enable external

oversight on whether anti-racism progress is genuinely being pursued by the Scottish Government. In short, it is still challenging to see reflected in the IPP what was actually implemented, was it effective and was its effectiveness evaluated and reported on.

For this reason, a further accountability method was designed by the AIGG. Improved accountability methods are being used to scrutinise and further progress important work including by the NACWG and the Poverty and Inequality Commission. Accountability which is robust, thorough, transparent, and open to more people to participate in should be the standard across the Scottish Government.

Scrutiny processes which enable a review of how the system is enabling or preventing the progress of systemic change is crucial. It is long overdue that accountability is delivered in a more accessible, co-designed and public manner that enables communities to not simply have a say, but to have the power to seek change and answers to questions on Scottish Government delivery related to anti-racist practice (and indeed, wider inequalities). Not only does this enable more competent policy to be developed, but it builds trust between Government and communities and would better meet the "Open Government" principles to public participation that the Scottish Government has already committed to.

A core part of open governance and good practice participation is moving beyond simple consultation to identify recommendations or reinforce decisions already made, and instead having the ability to scrutinise, co-design and fully engage in institutional processes.

Section 2 – The challenges and risks to delivering competent accountability mechanisms:

This accountability process was to provide initial review of the delivery of the Immediate Priorities Plan (IPP) which was launched in 2021 and includes recommendations from the Covid-19 Ethnicity Expert Reference Group as well as the Race Equality Framework (REF). Whilst on the surface it may seem appropriate for a plan of this kind to combine all recommendations and requests related to "race equality," in reality it has created a complex and unwieldy document which make efforts to deliver transparency, coherence, and accountability more difficult. The plan includes 37 different overarching policy areas/recommendations with multiple sub-recommendations on almost all of these. As a result, developing an accountability mechanism which can assess progress well, without requiring a long, drawn-out process, was extremely challenging.

It is right and necessary that efforts targeting anti-racism are wide-ranging across Government policy areas., There is an evidenced need for there to be anti-racism action across budgeting decisions, education, health and social care, justice, sport, creative industries and more. However, the method of generating, effectively, a long action list of this kind, creates a strategy which is difficult to assess and prevents full transparency. **The AIGG includes members with significant policy-making and influencing expertise. It was provided with a secretariat and resource, as well as a one-year period to do this work. Despite all of that, the way in which the IPP was created did not enable swift or accessible working. If resourced groups like the AIGG cannot fully use it, there is little hope for people or communities who are most impacted by the progress (or lack thereof) on these recommendations to be able to hold Government and public institutions to account through it.**

Policy coherence across anti-racism related efforts

Policy coherence can be defined as the systematic reduction of conflicting policy objectives, activities and outcomes across Government.

The accountability survey specifically asked about how policy coherence was being ensured across policy areas given the complex and wide-ranging extent of activities within the IPP. This was asked in the knowledge that coherence and connection between policy areas has often been a point of tension across

policy interventions and strategies. There is need for analysis of the purpose of "coherence" to ensure that coherence of policy is not in fact a coherence of strategic inaction across policy areas. The risk of endless reporting via internal groups is real. Lack of actual actions risks enabling systemic racism.

The vast majority of responses referred to internal working groups enabling cross-portfolio communication. Whilst this is welcome, the AIGG is aware that a senior leadership group is being formed to ensure more robust policy coherence as a consequence of NACWG recommendations. It is hoped that, in its commitment to intersectional analysis, the work of the IPP, REF and anti-racism interventions is included in this.

In terms of policy coherence, the responses related to child poverty provided the most detailed and helpful overview. This is unsurprising given the cross-government prioritisation to tackle child poverty and the clear national, public commitment which has pulled in resource from across portfolios. However, policy coherence cannot only be resourced and given importance when a particular issue is given this level of spotlight.

A particularly striking response from the accountability survey detailed the need for more cross-policy working after those working on the policy area in question felt they had to "scramble around the staff directory" in order to identify staff working on "race equality" to support engagement work in relation to the IPP recommendations.

Policy-making does not exist in issue-based silos; for example, there exist both causes and consequences between racism, poverty, housing, and the economy and as such, successful policy-making needs to have clarity and coherence across multiple areas of Government. All portfolio areas need to be linked to equalities and the anti-racism team within them. It is hoped that the Scottish Government's mainstreaming strategy will deliver more of this connectedness; however, we strongly advise that this is not lost in a generic "equality and diversity" pursuit and instead has very clear anti-racism, intersectional competencies both at the individual and organisational level. Such work, for example, should seek to identify and tackle systemic structures that cause injustice and other "upstream" causes of inequities within and across policy areas.

Questions then arise as to how policy coherence and cross-portfolio delivery on anti-racism are being assured competently within Scottish Government with a document/strategy as generalised as the IPP. A more effective action plan is needed, which provides clarity and crucially, accountability of ongoing Scottish Government activity in this area. This must be a key consideration in the next iteration of the Race Equality Framework.

Delivering for communities:

The experiences of discrimination, of exclusion, and of racism are shared between many communities in Scotland who come under the categorisation of "minority ethnic." Whilst in many ways this creates a collectivism across communities and, it is hoped, elevates its importance through a recognition of a larger population size in Scotland, it cannot give permission to a diluted, or "one-size-fits-all" approach to delivering change.

This approach will only do a disservice to the adversely racialised communities we are working to deliver a changed Scotland for. The IPP takes this "one size fits all" approach too often in the way it is written and the way it is being pursued. It is right that "minority ethnic" communities come together where there are shared experiences, and policy enables an understanding of that, but equally, evidence, data and knowledge must exist which are able to identify and respond to the differences in experiences and outcomes that exist between communities.

Any "generic" approach contradicts the efforts of the Scottish Government to take an intersectional approach and the commitments it has made in this area (which are highlighted in the internal work Scottish Government has started through the development of tools to deliver intersectional social research.) It is crucial that the delivery of anti-racism activities and future strategies like the IPP understand and respect both the important collective experiences of racialisation and, equally, the differences in how society and systems harm different communities.

The system response to accountability:

The AIGG expressed a need for accountability methods of this kind to be trialled due to the lack of robust scrutiny on the implementation phase of recommendations and plans (which has been found to be the case by other advisory groups including NACWG and the Poverty and Inequality Commission). In order for anti-racism accountability to take place in a meaningful way, power redistribution needs to be enabled by the Scottish Government. The current system around accountability is largely through external working groups: requesting access to information, reviewing the limited information available and with limited status within Government to influence decision-making or auditing. Whilst working groups of this kind are useful, they operate within boundaries which are pre-determined by the power they are attempting to scrutinise. In order for this to change, new boundaries need to be co-designed with communities directly to disrupt the ways in which systemic racism exists across institutions, even those which are committed to "race equality." **By re-designing this way of working through co-production, transparency, and accessibility, it is enacting a commitment to anti-racism delivery.**

Furthermore, there is a distinct lack of reporting and investment in assessing what interventions have made a tangible difference for marginalised and racialised communities, as well as a lack of evidence which assesses ourselves against nations which are ahead of Scotland on progressing anti-racism delivery. As a consequence of this, we run the risk of maintaining the status quo: repeating the same types of interventions with little analysis of how and why they work. Whilst third sector organisations have done some analysis of this, it is important for national and local government to invest in such reporting which not only assesses the success of current delivery for communities but enables improved and evidence-led interventions in the future. **Again, a commitment of this kind of reporting (beyond the insufficient assessment of EQIAs) is an investment in anti-racism delivery, and needs to become part of the "mainstreaming" activities of the Scottish Government, with an expectation set of all policy areas.**

Section 3 – what was learnt about progress from this round of accountability questions:

The accountability questions enquired about the rate of progress across recommendations. Table 1 illustrates where officials "self-assessed" the recommendations they were responsible for against a 5-scale assessment (as at February 2023):

1 - We are just beginning / at the very early stages of concept	Publication of the Long-term Scottish Government Race Equality Strategy, to run from 2023 onwards;
	Systemic Recommendation 14 - Recovery and Remobilisation Plans, Investment Fund and Reporting;
	Data Recommendation 8 - Primary Care Health Ethnicity Data Collection;
2 - We are planning the action and conducting consultation about the proposed action	Data Recommendation 14 - Accountablity and Governance - Public Bodies
	Systemic Recommendation 3 - Test and Protect and Future Health Measures;
	Delivery of the Race Equality and Anti-Racism in Education Programme
	Publication of the Long-term Scottish Government Race Equality Strategy, to run from 2023 onwards;
	Continued support and delivery of the John Smith Centre's Leadership Programme;
	New Human Rights Bill
	Systemic Recommendation 4 - Fair Work Practices; Systemic Recommendation 9 - Anti-Racism Actions; Data Recommendation 10 - Monitoring Workforce Data; Data Recommendation 11 - NHS Workforce Data; Data Recommendation 14 - Accountablity and Governance - Health Workforce
	Publication of the Long-term Scottish Government Race Equality Strategy, to run from 2023 onwards; Data Recommendation 3 - Develop a CHI field; Data Recommendation 8 - Primary Care Health Ethnicity Data Collection; Data Recommendation 2 - Linkage to Census;

3 - We are in the middle of completing the action	Publication and implementation of the Child Poverty Delivery Plan, starting in March 2022, in particular action taken on the priority group "minority ethnic families".
	Systemic Recommendation 13 - Housing and Overcrowding;
	Fair Work Programme Board and Systemic Recommendation 15 - Employment;
	Data Recommendation 13 - Reporting Data by Ethnicity 13b - Public Health Scotland must publish an annual monitoring report on ethnic group health inequalities in Scotland;
	Systemic Recommendation 6 - Public Health Messaging;
	Systemic Recommendation 14 0 Recovery and Remobilisation Plans, Investment Fund and Reporting;
	Develop a new hate crime strategy which will contribute towards building more inclusive and resilient communities and support implementation of the Hate Crime and Public Order (Scotland) Act 2021.;
	Systemic Recommendation 2 - No Recourse to Public Funds;
4 - We are at the end stages of completing the action / in the process of review and assessing impact	Systemic Recommendation 14 - Recovery and Remobilisation Plans, Investment Fund and Reporting;
	Fair Work Programme Board and Systemic Recommendation 15 - Employment;
	Systemic Recommendation 11 - National Performance Framework;
5 - The action is fully completed and reviewed	Implementation of actions to support the recently published Equality Outcomes document and commitments within Equality Strategy for Social Security Scotland.;
	Systemic Recommendation 17 - National Museums and Statues;
	Systemic Recommendation 10 - Corporate Accountability;

The purpose of asking for a self-assessed measure of progress, was to understand if scrutiny of progress internally within Scottish Government matched that of external assessors and those working as "external stakeholders" or experts on the recommendations in the table above. Whilst this was largely the case, there were some assessments here that the AIGG did not agree with and would have marked as being at earlier or preliminary stages of development. These included:

— Systemic Recommendation 3 – Test and Protect and *Future Health Measures*

— Systemic Recommendation 13 – Housing and Overcrowding

— Data Recommendation 13 – Reporting Data by Ethnicity and 13b - Public Health Scotland must publish an annual monitoring report on ethnic group health inequalities in Scotland

— Systemic Recommendation 6 – Public Health Messaging

— Systemic Recommendation 15 - Employment

In reviewing the responses received, there was insufficient evidence, as presented in the submission, to substantiate the self-rating given. As such, the AIGG felt the delivery of these recommendations were in fact further behind than indicated and from comparison against the progress of other recommendations. The AIGG would welcome these policy areas re-considering the extent of progress being assumed here and further reflect on the questions asked in the accountability survey.

The systemic challenges and barriers when assessing attempts to undertake intersectional analysis

The accountability survey asked a number of questions about intersectional analysis. It purposefully asked questions about specific intersections alongside "race"/ethnicity to build a picture of deliberative intersectional design and analysis taking place across Scottish Government anti-racism related delivery. The survey asked about the intersections of "race"/ethnicity and sexuality, poverty/class, disability, gender/sex, age, religion and caring responsibilities.

 It is well evidenced that those who experience multiple and compounding inequalities, for example sexism and racism, racism and poverty, racism and ablism are disproportionately more likely to experience systems and policy that are not fit for purpose. The Scottish Government has on multiple occasions, and most recently through accepting the First Minister's National Advisory Council on Women and Girls' recommendations, made commitments to take an intersectional approach.

This is further evidenced by the publication of the Scottish Government's own [toolkit and evidence](#) base on taking an intersectional approach across social research.

Across a number of responses to the accountability survey from across policy areas, the AIGG expected, and indeed received, explanations that intersectional considerations had not been considered.

The responses to our accountability survey revealed a significant lack of understanding around intersectionality and the Government's own commitments to this.

The responses also showed that comprehensive and current enough disaggregated data did not exist to enable an intersectional analysis (particularly around religion and "race"/ethnicity, age and "race"/ethnicity, sexuality and "race"/ethnicity and disability "race"/ethnicity). The AIGG appreciates the challenges in collecting such data; however, investment and prioritisation of this is necessary to enable fit for purpose policy making for those most marginalised. Whilst the above is already not enabling the extent of intersectional analysis required to deliver for marginalised and racialised communities and those furthest from access to opportunity, power and financial stability, a particular issue became apparent from responses received by some policy areas: that the term intersectionality was simply not being understood.

In multiple responses when asked about the intersection of, for example, "race" and disability, the replies included homogenised data about disabled people's experiences, rather than what was being asked: data and insight on racialised disabled people's experiences. Furthermore, in some responses there was an over-simplified response stating that "all protected characteristics have been considered in the development of this activity." Whilst data across public institutions is usually collected and categorised through protected characteristics, intersectionality asks that this data is disaggregated and analysed to assess the experiences and consequences of overlapping and compounding inequalities. Intersectional analysis is *not* delivered through siloing of data based on a single protected characteristic. Data of this kind, whilst helpful in providing an overview of the experiences of a community, often disguises or dilutes the reality of lived experience for those who experience multiple inequalities; for example, intersectional data on poverty and religion tells us that Muslim communities are disproportionately more likely to be in relative poverty and within this, those who are migrants and whose second language is English even more so.

The lack of understanding on what these sets of questions were asking is a concern, and reiterates the need for a coherent and well understood definition of anti-racism intersectional practice in policy development, research, and system design.

Over-reliance on current EQIA processes:

Alongside questions on intersectionality, the accountability survey requested insights into how issues had been identified and overcome in relation to inequality and discrimination. On multiple occasions we found an over-reliance on Equality Impact Assessments (EQIA). Whilst there is a duty to conduct EQIAs, third sector equality organisations have repeatedly stated the need for EQIAs to be utilised in a more robust manner. They have identified a skills deficit across public institutions which limits the extent to which EQIAs are able to deliver policy and systems which have adequately assessed the needs of marginalised communities. Whilst EQIAs provide a baseline of information, this is entirely dependent on when EQIAs are conducted in the policy-making process, how they are conducted, what resource is made available and what data is available. The Public Sector Equality Duty (PSED) is currently under review, and potentially this provides an opportunity to identify significant improvements in how EQIAs are conducted.

Responses to the 2022 consultation on PSED review further illustrate the limitations of EQIA. As the Mobility and Access Committee for Scotland (MACS) explained, "The increased focus on the EQIA process needs to be more robust in the elements around advancing equality of opportunity as the current focus is skewed towards identifying and eliminating discrimination. This focus doesn't necessarily reduce the inequality gap." Close the Gap suggested the following to advance women's equality via PSED: "A new regulation should set out minimum standards that public bodies must comply with in how they use equality impact assessment." Taking an intersectional approach, this would advance anti-racism approaches.

EQIAs are a requirement which sets the floor, not the ceiling of what should be expected when pursuing anti-racism policy-making. Whilst the PSED review is ongoing, consideration must be given to the lack of intersectional assessment enabled through EQIA and where more robust assessments can be pursued in addition to EQIA. Policy area leads for recommendations of the IPP should consider where specialist, external expertise on anti-racism (including within Scotland's third sector) can be partnered with to enable robust analysis in conjunction with EQIAs.

With the current quality of EQIA completion, it is simply not enough to point to the completion of an EQIA as a fair assessment of the consequences for marginalised and racialised communities in any policy or process.

There is a lack of lived experience expertise inclusion and understanding of what this involves.

The accountability survey asked leads to explain what, if any, lived experience expertise was included in the delivery of recommendations. In some cases, such as reporting mechanisms or internal Scottish Government process related recommendations, it is understandable that lived experience expertise directly from communities would not need to be sought.

Many recommendations relate to a change in policy or the development of something new, for example on public health messaging, young people's access to work and private sector housing. In these cases, lived experience input is crucial; however, responses indicate a very limited outreach to the very communities who are impacted by the policy intervention. When lived experience input was asked about, the majority of responses stated that they had engaged with stakeholder organisations. Whilst this is of course important, the question was not about stakeholders and equalities organisations, it was about lived experience expertise and direct power redistribution to communities most impacted by poor policy making. The same critique has been made in relation to the delivery of women's equality related policy, which must go beyond those with access and power and instead open the doors to power to more people.

In some cases, lived experience was wrongly interpreted as having a steering group that met periodically and included stakeholders and officials. The responses related to work on Hate Crime and No Recourse to Public Funds, detailed the funding of stakeholder organisations to deliver lived experience expertise workshops and/or community sessions specifically with "BAME" or specialist community organisations. This is very welcome. However, it important to note that this would not be categorised as "deliberative democracy" or "meaningful participation" as this is only improvement to *consultation* practice.

Lived experience and meaningful participation by the Scottish Government's own good practice examples (for example, the development of Social Security Scotland or lived experience boards working alongside the Scottish Government on the Human Rights Bill) refer to resource and time given to creating space "by and for" those who are furthest away from access to power, opportunity and financial security. It enables the ability to provide feedback on decisions, but crucially influence design and outcomes. Across the accountability survey responses, only one example of such resource and effort existed and that was through the new Human Rights Bill.

It is appreciated that this level of resource and time cannot be afforded to every recommendation in the IPP and nor is it an appropriate intervention for every recommendation. However, across IPP delivery and the forthcoming review of the REF, there is an opportunity for an ongoing lived experience expertise panel to be formed, invested in and enabled to co-produce and scrutinise ongoing delivery of the Race Equality Framework. By doing so, the Scottish Government is able to deliver on its commitments to "open governing" and the principles of the recent "institutionalising deliberative democracy" report and ensure a robust, power-redistributive, anti-racism approach.

A final point needs to be highlighted on the extent of misunderstanding of lived experience participation/engagement in relation to the Racialised Health Inequalities in Health & Social Care in Scotland Steering Group. Whilst it is welcome that NHS and Scottish Government officials who are also from adversely racialised backgrounds are involved in this group, that is not sufficient in terms of lived experience participation nor power redistribution, as all inputs were from within the system itself. It is crucial that lived experience expertise is understood as being out of public institutions and within communities, otherwise no power has been redistributed at all. Furthermore, unless there is expertise included from those scholars and experts who understand how racism functions in systems of policy and decision making, there is a risk that lived experience is shared, but how to disrupt the mechanisms which operate to create that inequity of experience and could be operationalised to address that systemically is not.

Key challenges: Lack of resource, time, staff capacity and leadership:

The survey asked respondents to provide the AIGG with an overview of key challenges that have been experienced and how, if at all, they were mitigated. There were clear patterns between policy areas related to a lack of resource as well as time and on staff capacity/expertise.

On the issue of resource and time, multiple policy areas/recommendations indicated that a lack of funding and an over-stretched workforce within the Scottish Government prevented the extent of activity and engagement required to deliver their work. For example, within the housing and tenants' rights related policy recommendations, the responses clearly state that, due to limitations in staff capacity and ability to resource "high quality tenant participation", "alternative" methods of engagement were taken forward.

The response itself admits that an alternative to "high quality" was pursued and, given that participation efforts with marginalised and often ignored communities require, rightly, more resource and time, it is likely that a consequence of limited staff capacity in this area will have an impact on which communities get access to power and influence over decisions that affect them.

Similarly, the recommendation related to public health messaging detailed how a lack of staff capacity and resource meant that intended activities were unable to take place and the project focus has become narrower and, as such, about fewer communities.

For the work of the IPP to be delivered with the intention with which it was created, adequate resourcing is required; this includes resources of staff time as well as adequate resource for community organisations to enable outreach, engagement and lived experience participation to be delivered competently.

Many responses included a recognition of the need for further skills and capacity building within the Scottish Government, other public institutions, and specific policy areas. Skills needs identified included a better understanding of anti-racism and how it can be applied to policy-making and service design. Given the importance of these skills, it is very welcome that officials were able to be honest about the need for this and seek to advance their knowledge on these issues. We welcome the on-going work between the Racialised Health Inequalities group and CRER on advancing some of this learning.

Two responses related to skills also stated the need for improved understanding and use of EQIAs by public institutions. This is particularly important given the PSED review and the extent to which EQIAs were leant on in feedback of this survey. One response made particular mention of this, stating that capacity issues across the public sector "impacts the effectiveness of the PSED regime in Scotland." This requires urgent and resourced intervention.

Importantly, a few reflections which summarise these patterns should be noted and acted on by Scottish Government to advance its own capabilities to deliver its commitments: *"…some gaps in anti-racist understanding and practice, insights into working with racial trauma, resource to meaningfully engage with communities and young people"*

"Lack of knowledge and understanding on race equality, systemic racism and race discrimination in policy and delivery partners…"

Finally, two responses also expressed the need for improved and visible leadership within Scottish Government to direct this work and ensure adequate space for this within Government and to advance its pace. Given the importance of this work and the prioritisation of "equality" and "community" in the recent Scottish Government policy prospectus, it is surprising that, internally, a lack of leadership to progress anti-racist activity is being seen as a barrier. It is crucial that this is rectified across directorates in order to support those staff and officials who are leading on the delivery of recommendations and to ensure this delivery is done so with the intention and focus it was first developed with by external expertise and lived experience.

Limitations in access to data:

A final, but critical, pattern in responses was the acknowledgment of the need for improved, disaggregated data. Limitations on the ability to fully evidence community needs and to evidence and track progress are hampering the ability for Scotland to deliver on its anti-racism commitments. Multiple responses (six) included the need for improved, disaggregated data, the need for knowledge on how to gather lived experience data, and improvements in the ability to analyse data through an anti-racism perspective were all made clear. We welcome these honest responses from policy area leads and hope to see investment in this being taken forward. Comments included:

"Better, disaggregated data would enable us to pursue more targeted and intersectional interventions."

Issues related to ethnicity/race data have been made over multiple years by many different organisations including third sector partners, academic groups and indeed, the COVID19 ethnicity expert reference group. The gaps have been highlighted to Government on many occasions and are now being highlighted internally. We need to move beyond identifying gaps and instead invest in gathering the data required to enable Scottish Government to respond more fully to the needs of racialised communities, embed anti-racist approaches competently and deliver for marginalised communities who experience multiple and compounding inequalities.

Section 4 – What comes next:

What we have learnt from this process for future accountability methods:

The AIGG asked for feedback on the accountability process itself. Around half of the responses were positive/somewhat positive towards the process and survey questions. The vast majority of responses understood and agreed with the need for an accountability method; however, concerns were raised about the length of time it took for staff to respond and gather the information needed. Whilst the AIGG appreciates this and would agree that some questions can be reconsidered or removed for future iterations, we would state that reflection of this kind is not only important, but necessary. We asked the length of time it took for people to complete the necessary responses and data collection; on average it was less than 1 working day. Whilst we appreciate there were those who took longer, we do not think this is an unreasonable length of time for important scrutiny to take place.

We did state that this was an iterative process and as such will take on feedback for any future accountability methods. This includes asking more specific and policy-area tailored questions to ensure relevance, more pre-survey engagement and direct conversations and the potential for a briefer survey with time instead given to direct discussion across different levels of staff seniority (rather than discussions solely with directorate leads).

Building on this accountability method trial:

The learning from this first trial of an accountability method of this kind will be taken on board by the Anti-Racism Observatory which, with its independence from Scottish Government, will be an ethical and appropriate space for accountability of this kind to be delivered in a way that can lead by example. It is envisaged that the Anti-Racism Observatory for Scotland will be launched in late autumn 2023 and a second "accountability process" will begin in spring/summer 2024.

This will likely review a wide range of anti-racism specific activities but also anti-poverty interventions and wider-policy areas to assess the extent to which anti-racism is being acted on across Government in a coherent, evidence-based, and community-led way. The accountability process in the next phase within the Anti-Racism Observatory will be designed alongside experienced staff, community expertise and with partners who have engaged

in this type of activity before. The Anti-Racism Observatory will be learning from this trial and engaging with Scottish Government officials early in the process to discuss expectations and purpose and provide a foundation of knowledge on what is needed for this to be beneficial for both the AROS and the Government. The latter in particular is derived from learning from this trial as feedback was received stating that more discussion, workshops, and pre-survey engagement would be appreciated.

Reports from engagement of this kind would be written for public engagement purposes, and it is hoped that, whilst the next phase of accountability will be focused on the activities of the Scottish Government, future phases will be with a wider range of public institutions. It is hoped that, through this model, a Scotland-wide foundation of anti-racism accountability will be developed and an expectation set of both communities and institutions. We hope that this aim will enable tangible and meaningful power-redistribution.