

# Building anti-racism into how we hold public institutions to account:

A review of how the Scottish Government holds itself to account on race equality.

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

June 2023

## Preface

Like many forward-looking nations, Scotland recognises that systemic, structural and organisational racism<sup>1</sup> is behind much of the unfairness and discrimination that adversely racialised<sup>2</sup> communities face today ([ERG, 2020](#)).

Over the last 20 or so years, the Scottish Government has brought in 39 policies<sup>3</sup> containing 817 commitments and actions on “race” equality<sup>4</sup> ([CRER, 2021](#)). In spite of them, little progress has been made. One reason for this is that few checks were put in place to make sure it acted on these commitments. Another, is that the very way that Scottish Government and other public institutions<sup>5</sup> make such policies has racism “baked into” it.

If we are to bring about “race” equality, therefore, we must first change the systems that create unfairness and discrimination (or “inequity” as we call it in this report). That means getting our public institutions, including the Scottish Government, to make policy in ways that are anti-racist<sup>6</sup>. We must then put strong checks in place to make sure they are doing this. All of this must be done with the communities themselves working as equal partners.

This report is a first step on that road. We hope the Scottish Government will use our findings and recommendations to reflect on its “race” equality work. Doing so, will help it to see where and why its actions so far may be falling short. It will also help it to understand why we need a new way of holding it to account and what that process might look like.

We thank the Permanent Secretary for allowing us to do this work. We also thank everyone who took part in the review.

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# Section 1: Background to the review

## Introduction

We, the [Anti-Racism Interim Governance Group](#) (the AIGG), ran from April 2022 until September 2023. During that time, one of our aims was to agree what the new Anti-Racism Observatory for Scotland (the AROS) would look like and how it would work. The other was to look at what progress the Scottish Government has made on its [Immediate Priorities Plan](#) (Plan) for “race” equality.

This report is about the second of these aims. However, we wanted to take this a step further. The Plan sets out how the Scottish Government will deal with recommendations from the Expert Reference Group on COVID-19 and Ethnicity. It also explains how it will meet the goals of its [Race Equality Framework 2016–2030](#). However, the Scottish Government has not reviewed the Plan since it was first put in place in September 2021. So, we asked if we could not just examine its progress on the Plan but also test out a new way of assessing the Plan and the progress.

The Scottish Government’s Permanent Secretary<sup>7</sup> agreed. And so in the pages that follow, we set out our findings on both the progress the Scottish Government has made and how we went about assessing that.

## Why we need a new way of holding the Scottish Government to account

The Scottish Government published its Immediate Priorities Plan (the Plan) for “race” equality in 2021. The Plan sets out what it will do in response to recommendations from the Expert Reference Group on COVID-19 and Ethnicity and the goals of its Race Equality Framework 2016–2030 (REF).

Up until now, the Scottish Government has been reviewing progress on its Plan every three months. This involves departments giving a brief update on what work they have been doing...

Both we and the Scottish Government agree that this is not an effective way of holding it to account. In effect, it is simply tracking what has been done so far. What it does not do is help us understand what is and is not working and why; and what real and lasting impact on structural racism, if any, they are having. Nor, as we shall see below, does it involve the very communities it is meant to help.

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<sup>7</sup> The chief official policy advisor to the First Minister of Scotland and the most senior civil servant in Scotland.

## The Plan is hard to follow and progress hard to assess

As we explained above, the Scottish Government's Immediate Priorities Plan (Plan) brings together two sets of work: 1) the Expert Reference Group on COVID-19 and Ethnicity's recommendations and 2) the Scottish Government's Race Equality Framework's goals.

On one level, it may seem sensible to combine all these actions on "race" equality under one plan. In reality, however, it has created a very long and complicated to-do list for the Scottish Government. The Plan contains 37 different major policy area goals or recommendations, almost all of which have more than one sub-recommendation.

As a result, we struggled to come up with a way to review progress in a way that was not also long and drawn out. This was in spite of the fact that the AIG group has members with a lot of expertise in policy-making and influencing; the Scottish Government gave us an admin team to help us; and we had a whole year in which to do this work.

If we, with all the help we had, found it hard to assess what progress the Scottish Government is making, it is unlikely that communities will be able to.

## The process does not give power to communities

For communities to be able to hold our public institutions to account, they must have the power to do so. At the moment, the job of holding the Scottish Government mainly falls to external working groups made up of ??????. The process itself is also quite basic: the working group asks for the information the Scottish Government has on its progress and then reviews it. It has little authority or power to ask for other information or influence what happens as a result of what it finds.

We believe that working groups of this kind are useful. However, because the body they are assessing is also the one telling them how to do their job, they are limited in what they can do. To become truly anti-racist, the Scottish Government must give adversely racialised communities the power to assess it. It must also let those same communities decide the scope of this work and how to do it.

A way of holding the Scottish Government to account for anti-racism that is co-designed with communities, accessible and open for everyone to see is long overdue. The [National Advisory Council on Women and Girls](#) has developed an effective way of holding organisations to account for gender equality. The [Poverty and Inequality Commission](#) has done something similar to tackle inequality through poverty. These ways include getting members of other organisations and the public to take part...

Adversely racialised communities deserve not just to have a say; they should have the power to ask questions and demand change too. That is how good policy is made. It is also how trust can grow between Scottish Government and communities; and it is a way for the Scottish Government to live up to its "[Open Government Partnership](#)"<sup>8</sup>.

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<sup>8</sup> "A commitment to openness, transparency and citizen participation across everything we do as a government."

Effective accountability must go beyond simply looking at what gets done. It must question what gets done, what does not get done and why, and what the impact is. And it is for communities to co-design and lead on how best to do this.

### The process sees communities as a single group

Many different communities in Scotland come under the heading “adversely racialised”. Seeing them as a single group can be helpful, in that people may feel they are not alone in the discrimination, exclusion and racism they face. It might also make them feel stronger, in that together their experiences are harder to ignore. What it must not do, however, is allow public institutions to think that a “one-size-fits-all” approach is the answer. Yet this is what the Scottish Government’s Plan does, in both the language it uses and the actions it inspires.

Where their shared experiences can improve policy for all adversely racialised communities, it can be powerful for communities to be seen in this way. But, policy-makers must also understand the differences between communities and the different harms and inequity they experience as a result. Ignoring these differences will also weaken the Scottish Government’s efforts to be intersectional and the commitments it has made in that area<sup>9</sup>

It is crucial that anti-racism work, now and in the future, respects both the similarities and differences in communities and their experiences.

### The process cannot tell us what does or does not work

At the moment, we have little evidence about which “race” equality actions do and do not work in Scotland. Nor do we collect information that could tell us how we are doing compared with nations that are ahead of us on anti-racism. As a result, we risk doing the same things over and over and making little or no real or lasting impact.

Some third-sector organisations<sup>10</sup> have looked at... But we need the Scottish Government and other public institutions to do more too. All work on “race” equality should be evaluated or assessed so that we can understand what works, what does not work and why. Only by doing this can we learn what we need to do in the future.

Evaluating or assessing all actions on “race” equality should be standard practice across the Scottish Government.

We believe that true accountability happens when members of the public have the power to take part fully in reviewing, co-designing and shaping the policies that affect them. This too, should be the standard across the Scottish Government.

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<sup>9</sup> For example, the Scottish Government’s work to develop tools for doing intersectional social research.

<sup>10</sup> Voluntary and community organisations, social enterprises, mutuals and co-operatives.

## Section 2 – What we did

To do this work, we needed to hear from the people leading on the Plan’s recommendations and goals. (In this report we call these people “policy leads”.) Their answers would show us what has or has not been done so far; they would also tell us what is helping or stopping progress, and therefore what the Scottish Government needs to do for its Plan to succeed.

We therefore drew up [an online survey](#). In it, were 84 questions covering the following nine areas:

1. Period—information about what recommendation or goal the respondent is working on; the start and end date; whether it builds on work that was already being done; how far on the work is.
2. Relevance and policy coherence—which “visions or goals of the Race Equality Framework each respondent’s work relates to; how their work ties in with what other Scottish Government policy areas are doing.
3. Collaboration and inclusivity of actions—whether they have brought in others to help them, including organisations led by communities or people with lived experience; if they have, what they have brought them in to do.
4. Resource allocation and procurement—what money or other resources they have been given to do this work (including bringing in communities to help); whether what they have been given is enough.
5. Intersectional<sup>11</sup> considerations—whether they have also looked at how gender, age, sexuality, disability, class, religion or caring duties combine with racism to cause more inequity.
6. Impact, data, monitoring and evaluation—how they assess their work and its impact; whether anti-racism experts or people with lived experience help them to assess it; what data they use to do this.
7. Challenges encountered and response—what problems they face doing the work; how they overcome these problems; whether they bring in anti-racism experts or people with lived experience to help.

Support and capacity development—what gaps there are in their knowledge or training; what support they get to help them in this work.

Feedback on the form and the process—what they think about both of these, including how long it took to do the survey and how useful they think the process is as a whole.

The questions were a mix of “yes or no”, multiple-choice (where respondents choose from a list of possible answers) and open-ended questions (where they could answer in their own way, in their own words).

### The start of a new “accountability process”

Our questions were, in effect, a new way of holding the Scottish Government to account—a new “accountability process”. They drew, in part, on the National Advisory Council on Women and Girls’ (NACWG) successful accountability process, which it set up in 2022...

We see this new process as just the first stage in improving how we hold the Scottish Government to account for anti-racism. It will be the AROS’s job to lead and develop this work in the future.

### Preparing the way

It was important to us that the Scottish Government understood how this work would help it. We therefore took a great deal of time<sup>12</sup> talking to senior Scottish Government staff and developing guidance that made it clear what we were doing and why. We were helped in this again by the fact that senior government staff had gone through a similar process with the NACWG.

Our AIGG co-chairs, Professor Ima Jackson and Talat Yaqoob, also held two workshops for Scottish Government staff. Their purpose was to explain why we were doing this survey and why it was important that staff took part.

Senior members of staff<sup>13</sup> then invited the policy leads working on the Plan to take part in the survey. They encouraged them to answer the review questions honestly and as fully as they could.

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<sup>12</sup> The time and work we had to put into this stage of the survey was a lot more **than we had expected**.

<sup>13</sup> The eight Directors-General (the eight head civil servants) and their Directors.

## Section 3 – What we learnt from our survey

A total of ??? people took part in our survey. All the Immediate Priorities Plan's (the Plan) recommendations and goals were covered by at least one respondent. Etc...

### 1. We tended to agree with respondents' own views on their progress

As part of our questions, we asked respondents to rate the progress they feel they have made on the recommendations and goals (as at February 2023), using a six-point scale. Table 1 summarises what they told us.

We were pleased to see that work on all the actions in the Plan had at least started. At the other end of the scale, only three had been both completed and reviewed. The most common response was that Scottish Government staff were in the planning or consulting stage, closely followed by being in the middle of the action.

#### 0 – The action has not yet started, no work yet undertaken

No responses.

#### 1 - We are just beginning or at the very early stages of concept

Publication of the Long-term Scottish Government Race Equality Strategy (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: Accountability 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: Accountability 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; Data recommendation 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: Recovery and remobilisation plans, investment fund and reporting.

Develop a new hate crime strategy that 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 or are in the process of reviewing 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

Actions to support the recently published Equality Outcomes document and commitments in the Equality Strategy for Social Security Scotland.

- Systemic Recommendation 17: National museums and statues.
- Systemic Recommendation 10: Corporate accountability.

We also asked this question so that we could see how well their views matched ours, given that we were independent reviewers from outside the government. On the whole, we agreed with their assessments. However, for the following recommendations we felt they were not as far on in the process as they did:

- Systemic recommendation 3: Test and protect and future health measures.
- Systemic recommendation 13: Housing and overcrowding.
- Data recommendation 13: Reporting data by ethnicity; and Data recommendation 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, we felt that progress on these recommendations was in fact further behind than our respondents believed and in comparison with the progress of other recommendations. We would encourage staff working in these policy areas to use our survey questions to look again at this.

## 2. Policy coherence is a work in progress

For the Scottish Government, policy coherence is when policies being developed by its different departments all work consistently towards (or, at least, not against) its wider aims or goals. Under its Plan, the Scottish Government is doing a great deal of “race” equality work across a range of policy areas. As such, there is a risk that individual policy leads do not keep other teams up to date with what they are doing. As a result, they may miss out on chances to work together, or worse, end up working against each other.

One of the best examples of policy coherence our respondents told us about was their work on child poverty. Given that reducing child poverty is a “national mission” and a “top priority across the whole of Government”<sup>14</sup>, this is perhaps not surprising. However, policy coherence or consistency should not just be taken seriously when a particular subject is in the public spotlight. It must become the normal way of working.

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<sup>14</sup> [The Scottish Government's policy on poverty and social justice.](#)

For the vast majority of respondents, the main way they kept in touch with colleagues in other policy areas was through working groups<sup>15</sup>. We welcome such groups. However, it is important that they do more than just report on what they are doing; they must drive action. Some gaps remain, too. For example, one respondent talked of having to “scramble around the staff directory” to find staff working on “race” equality who could help them speak to communities.

For these reasons, we are pleased to hear about a new senior leadership group the Scottish Government is setting up. This is in response to a recommendation from the National Advisory Council on Women and Girls (NACWG) calling for leaders to play more of a role in the Scottish Government’s work on gender. One of the new group’s aims will be to make sure the Scottish Government’s gender policies are consistent across the organisation. Because the NACWG is committed to intersectionality, we would expect this to take in anti-racism too.

This leads us to our final point here. Policy-making should never focus on just one area alone. For example, the inequities of racism, poverty, limited employment opportunities, poor-quality housing, illness, and so on, all have common causes and impacts; furthermore, “race” equality is relevant to every area of the Scottish Government’s work. Therefore, to be effective, the Scottish Government’s anti-racism policies must be coherent or consistent across all its work too.

With its goal of considering equality and human rights in all its decisions, policies and spending, the Scottish Government’s [Mainstreaming Strategy](#) will help to bring this about. However, within this more general drive for equality, it must not lose sight of its anti-racism and intersectionality goals.

We have said that the Immediate Priorities Plan is long and complicated. This makes it hard for the Scottish Government to ensure consistency across all the policy areas working on it. So when it next reviews its Race Equality Framework, its priority must be to come up with a new, more workable plan.

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<sup>15</sup> In this case, where members of staff from different policy areas come together in a group to work on specific projects.

### 3. Policy leads rarely consider intersectionality; some do not understand what it is or why it is important

Public institutions are used to collecting data on the protected characteristics<sup>16</sup> of their staff. Data of this kind is useful in describing these groups as a whole. What it cannot tell us about is people who face multiple, or intersectional, prejudices.

Intersectionality is what happens when other aspects of who we are overlap or combine with our “race” or ethnicity to cause further inequity. For example, intersectional data on poverty and religion tells us that Muslim communities are more likely than we would expect to be in relative poverty<sup>17</sup>; this imbalance is even worse for Muslims who are migrants or whose first language is not English.

The Scottish Government has said it will consider intersectionality in its work. For instance, it has produced an intersectionality toolkit or set of methods for its social researchers. More recently, it accepted a recommendation from the National Advisory Council on Women and Girls calling on it to take an intersectional approach...

In our survey, we wanted to know if the Scottish Government was looking at intersectionality in its anti-racism work. So, we asked staff if they had considered other identity characteristics—gender, age, sexuality, disability, poverty/class and religion, as well as caring duties—when deciding what to do.

As we expected, the most common answer, across all policy areas, was no. Indeed, many people did not know about intersectionality or the Scottish Government’s commitments to it.

Respondents also said that the data they needed to build a picture of intersectionality (particularly on how religion, age, sexuality and disability intersect with “race” or ethnicity) often does not exist. For example, some told us that while they had information on disabled people’s experiences, they had none on the experiences of adversely racialised, disabled people. Others simply wrote that “all protected characteristics have been considered in the development of this activity”, without giving any details.

We understand that it is hard to collect this kind of data. But if the Scottish Government’s policies are to protect the most marginalised in our society, it must make finding and funding ways to do this a priority.

That many staff did not understand what this set of questions was asking, is worrying. If Scotland’s policies are to work for the most marginalised in our society, policy-makers need to understand what intersectionality is, why it is important and why they need the right data.

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<sup>16</sup> Age, gender reassignment, being married or in a civil partnership, pregnancy or on maternity leave, disability, “race” or ethnicity, religion or belief, sex and sexual orientation.

<sup>17</sup>

## 4. Staff rely too much on Equality Impact Assessments

The purpose of Equality Impact Assessments (EQIAs) is to help develop policies that are fair and do not discriminate against certain groups. By law, all public institutions in Scotland must do them<sup>18</sup>.

When we asked respondents in our survey if they considered intersectionality, it was clear that they were relying heavily on EQIAs to do this... And yet, third-sector equality organisations have repeatedly said that staff in public institutions do not have the skills to do EQIAs properly. For example, 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.

A chance to improve the EQIA process may come from the Scottish Government's review of the [Public Sector Equality Duty](#) (PSED). As part of that review, it asked public sector bodies and equality advocacy groups for their views on the PSED. In their responses, a number of those groups spoke of problems with the EQIA process. For example, the [Mobility and Access Committee for Scotland](#) (MACS) said that,

“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”.

In addition, the charity [Close the Gap](#) suggested that to advance women's equality,

“A new regulation should set out minimum standards that public bodies must comply with in how they use equality impact assessment”.

From an intersectional point of view, this would also help in anti-racism work.

In the meantime, EQIAs set the least, not the most, that should be done when developing anti-racist policies. Given the poor quality of most assessments, simply saying that one has been done is clearly not enough.

We await the findings of the PSED review. In the meantime, we know that EQIAs do not ask policy-makers to consider intersectionality. We therefore suggest that policy area leads bring in specialists from outside Scottish Government (including from Scotland's third sector) to help them with this.

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<sup>18</sup> In 2012 Scottish Ministers put specific duties on Scottish public bodies to help them meet the Public Sector Equality Duty (2010). These included carrying out EQIAs.

## 5. Policy leads are not bringing in people with lived experience expertise; some do not understand what this means.

We asked respondents to tell us what, if any, lived experience expertise they had used. We know that not all the actions in the Plan need this, e.g., those to do with how the Scottish Government works on the inside, as an organisation. However, for many of the recommendations, the lived experience of those they will affect should be seen as crucial.

Despite this, very few respondents had tried to speak to communities. Some respondents thought, wrongly, that having a steering group that met from time to time and included stakeholders counted as having lived experience expertise. Quite a few others said they had talked to stakeholder organisations, including equalities organisations.

Both of these are, of course, important. But they are not lived experience. We were looking for evidence of policy leads giving communities the power to directly shape policies that will affect them. It is interesting that the National Advisory Council for Woman and Girls noted a similar lack of power-sharing in the Scottish Government's gender equality policies.

The example of the steering group (on health) referred to above, raises another problem with these groups. On the one hand, it is good that NHS and Scottish Government staff from adversely racialised communities are members of this group; on the other, as members of those organisations they are still part of the system they are trying to change. It is vital that lived experience expertise is understood as coming from outside public institutions and inside communities. If not, the power to bring about change will not be shared but will simply stay in the same hands.

In other examples, respondents working on Hate Crime and No Recourse to Public Funds said that they too had worked with stakeholder organisations. In these cases, they had paid them to run "lived experience expertise" workshops or community sessions with what they called "BAME"<sup>19</sup> or specialist community organisations. Again, improving how the Scottish Government consults communities is all very welcome. But we would not call this "deliberative democracy"<sup>20</sup> or meaningful participation<sup>21</sup>.

Meaningful participation occurs when marginalised people, i.e. those furthest away from power, are given an equal say. But what they say must then be used to shape what happens. This means that experts who understand how racism works in policy- and decision-making and, more importantly, how it can be removed, should also be involved. The Scottish Government has its own good practice examples of meaningful

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<sup>19</sup> Black and Minority Ethnic'.

<sup>20</sup> Communities and the Scottish Government coming together, as equals, to discuss common concerns.

<sup>21</sup> Communities sharing their views with the Scottish Government to influence decisions and bring about change.

participation in action<sup>22</sup>. One of these—using lived experience boards to help shape the Human Rights Bill—was mentioned in our survey. But it was the only example.

We know this kind of participation takes time and money. So doing it for every recommendation in the Plan is simply not possible. But there is another way:

The Scottish Government should set up a “lived experience expertise” panel<sup>23</sup> to advise it on all its “race” equality work. This would also help it to achieve its wider aim of giving Scotland’s people more say in its decisions<sup>24</sup>.

## 6. Policy leads do not have enough time, people or money

In our survey we asked policy leads to list the main challenges they have faced doing this work and how, if at all, they overcame them. A lack of time, people and money were common themes across every policy area.

A number of respondents said that having no funding and an over-stretched workforce was stopping them doing what they needed to do. For example, staff working in housing and tenants’ rights talked of not having skilled staff or being able to get tenants to take part in “high-quality” discussions. Instead, they had to find other, we assume “lower quality”, ways of working. Similarly, those working on public health messaging talked of a lack of skilled staff and resources. This meant that some of the activities they had planned could not go ahead, the scope of the project got narrower and they invited fewer communities to take part.

Involving marginalised and often ignored communities in this kind of work takes time, people and money. The examples above suggest that because of this, communities may simply not be given the chance to shape the policies that will affect them.

For its Plan to work in the anti-racism spirit in which it was created, the Scottish Government must give its policy teams the time and money they need. That includes money to pay community organisations for getting their members involved and their lived experience expertise.

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<sup>22</sup> The development of Social Security Scotland; lived experience boards working on the Human Rights Bil.

<sup>23</sup> A group of people who would come together regularly to advise the Scottish Government.

<sup>24</sup> [Scottish Government response to the Institutionalising Participatory and Deliberative Democracy working group](#).

## 7. Policy leads do not have the skills or the leadership they need

There were two further main challenges that respondents across all policy areas said they faced. These were not having the skills or the leadership they felt they needed.

Many respondents spoke of the need to develop the skills and knowledge of those working in the Scottish Government and other public institutions, both generally and in specific policy areas. That included improving their understanding of anti-racism and how to apply it when making policy and designing services.

Given how central anti-racism is to this work, we were pleased that staff recognised this and were keen to learn. We also welcome the training that the Racialised Health Inequalities group and the Coalition for Racial Equality and Rights run on this topic.

The poor quality of Equality Impact Assessments (EQIAs) came up again, under this question. As one respondent put it, the current quality of EQIAs reduces “the effectiveness of the [Public Sector Equality Duty] regime in Scotland”. We agree. Indeed, we think the Scottish Government should deal with this as soon as possible.

These views are well summed up by the following two quotes:

“...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 in this section, two respondents said they would like to see stronger and clearer leadership on anti-racism within the Scottish Government. This, they felt, would help to speed up this work, keep it on course and give it enough space to...?.

In his 2023–2026 vision for Scotland, the First Minister uses the words “equality” and “community” to describe his “new leadership”. We were therefore a little surprised that some respondents felt they were not getting enough support from their leaders. Nevertheless, we agree that clear leadership in this area is crucial.

**Leaders in the Scottish Government must do more to make staff feel supported. That includes making sure they have the right skills to do this work.**



## 8. Policy leads need better data

A final, pressing theme across policy areas was the need for better data. By better, our respondents meant data that can be broken down to specific categories of “race” and ethnicity, gender, religion, and so on. Without it, they will not be able to fully understand what communities need or how well their policies are meeting their needs:

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

In a similar vein, respondents also wanted to know how best to gather data on lived experience and how to analyse data from an anti-racism perspective. Again, we welcome their honesty and desire to learn.

Over the years, various other organisations—including third-sector partners, academic groups and, indeed, the Expert Reference Group on COVID-19 and Ethnicity—have raised concerns about the poor quality of data on “race” or ethnicity. This survey shows that staff in Scottish Government feel the same way. It is time for the Scottish Government to act on these concerns and invest in better data.

## Section 4 – What comes next

### What we have learnt from this first “accountability process”

In the last section of our survey, we asked respondents to tell us what they thought about the survey itself. The survey marks our first step in co-designing a new way of holding the Scottish Government to account for its “race” equality work. We were therefore keen to hear what respondents thought of it as a possible “accountability process”.

Some of our questions here were open-ended—that is, it was up to respondents whether they answered them, and when they did they could so in their own words. For that reason, it is hard to say exactly how many people said what.

With that in mind, about half of the responses were positive or positive to some extent about our survey questions and the process as a whole. The vast majority of those who took part agreed that we need a new way of holding the Scottish Government to account for its “race” equality work. However, some were concerned about how long it took to answer all 84 questions (bearing in mind that the last five questions were about the process itself).

We do have some sympathy with this. As we have said, this is just the first step in co-designing a new “accountability process”. We expect some of the questions and the process to change over time, not least as a result of this feedback. For the questions, this will probably mean focusing them more on the specific work being done. For the process, this may include building in more time to explain what we are trying to do to those taking part; talking to staff, rather than just surveying them, about their work; and talking to staff at various levels of the organisation rather than only those leading on policy areas.

That said, we believe that an effective accountability process goes beyond simply checking that milestones have been passed or targets met. Instead, it must look more deeply into what is and is not working and why, and what impact the work is having. Doing that properly takes time. Respondents told us that it took them less than one working day, on average, to complete the survey. We do not think that is a lot for such important work.

## Building on this first step to a new “accountability process”

As the AIGG comes to an end, it will be up to the AROS to take this review’s findings on board. At the time of writing, the AROS was due to be up and running in late autumn 2023. Once it is, we expect it to carry out a second accountability review of the Scottish Government in the spring and summer of 2024. Being independent of Scottish Government makes it the ideal body to lead this work.

What that second “accountability process” will look like exactly, we do not yet know. We do know that it will be co-designed by AROS staff, community experts and partner organisations with experience in this area. The findings of this first review suggest too, that the Scottish Government will want to join in these early talks—it is keen to make sure that both it and the AROS get the most they can from the exercise<sup>25</sup>.

We also believe the second review will look at a wider range of activities—not just action on anti-racism but anti-poverty projects and related work in other policy areas. In that way, it will be able to see if anti-racism is being built into policy-making consistently, across all aspects of the Scottish Government’s work.

And while the next review will continue to focus on the Scottish Government only, we expect that future phases will look at other public institutions. We hope that the accountability process that comes out of this work will become the model for holding all Scotland’s public institutions to account for anti-racism. Crucially, it will be a model that puts power in the hands of Scotland’s adversely racialised communities.

## Looking to the future

As we have said, this report marks the first steps in creating a new “accountability process” for anti-racism in the Scottish Government. We hope that what we have learnt will help the AROS as it develops its own “accountability” relationship with the Scottish Government—a relationship based on a shared commitment to anti-racism in Scotland and itself accountable to the Scottish public.

We understand that the AROS will also learning and working with other working groups and commissions to design an annual accountability exercise. The Scottish Government’s work on anti-racism will be its first point of focus. Over time, this will grow to take in other public institutions.

Indeed, the aim is for the AROS to become the main body in Scotland for holding all its public institutions to account for anti-racism. Our findings suggest that it will also have a role in helping them to improve both the skills (anti-racism; working with communities; learning from lived experience) and the data (broken down into intersectional categories; lived experience) they will need for this to happen.

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<sup>25</sup> The AROS will publish the results of all such discussions and workshops for public engagement purposes.

Crucially, the AROS will be working with communities at every stage. This includes co-developing anti-racism “accountability processes” and skills so that it is the communities themselves who hold our institutions to account. In this way, the power to shape what happens will be where it always should have been: with the communities who have been systemically racialised and marginalised.

The next step for Scottish Government will be reviewing its Immediate Priorities Plan and Race Equality Framework. To that end, we recommend that it do the following:

- Involve a full range of diverse stakeholders, including grassroots organisations with lived experience expertise, directly in this review.
- Draw up a shorter, more focused plan for its “race” equality recommendations and goals. The new plan should make it easier for everyone, including communities, to keep track of what needs to be done and what is being done.
- Review both its new plan and the Race Equality Framework regularly. Those reviewing it should include a full range of diverse range of stakeholders and grassroots groups and, crucially, the AROS.
  - This must go beyond looking at unhelpful performance indicators<sup>26</sup> and vague updates. Instead, this group should develop meaningful and accurate ways of assessing progress<sup>27</sup>.
- Make sure that teams working on anti-racism have the skills, people, time and money to do what they need to do. That includes building anti-racism into policies and being held to account for doing so.

Finally, we recommend that the AROS play a leading role in making this happen.

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<sup>26</sup> Measures used to “indicate” progress towards a target or goal.

<sup>27</sup> Scotland needs to move beyond the cycle of setting up working groups, publishing recommendations and then setting up more groups to discuss the very same recommendations. It is precisely this kind of inaction that enables systemic racism.

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