

# Poverty and Inequality Commission response to the Scottish Government Equality Evidence Strategy Consultation

October 2022

The Poverty and Inequality Commission provided the response below to the Scottish Government's [consultation on its Equality Evidence Strategy 2023 to 2025](#).

## List of Consultation Questions

### Section 1: Vision

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

#### Question 1.1

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

- Yes  
 No  
 Don't know

#### Question 1.2

[For respondents who answered 'Yes' Question 1.1]

Please say how the Scottish Government should revise the vision:

The vision should be revised to include a greater emphasis on intersectionality. The Commission believes that the overlapping inequalities that reflect the complexities of peoples' lives should be reflected in the vision, as this is required in order to meet the other aspects of the vision around enabling national and local policy makers to make “sound, inclusive policy”.

Hence the vision should be revised to include the commitment to “measure the impact on Scotland's equality groups *separately and in combination*.” (Or another form of wording with the same meaning.)

## Section 2: Proposed actions

The Equality Evidence Strategy 2023-25 will specify and define individual projects required to fill the gaps that have been identified. We have identified a number of proposed actions, as set out above in [Proposed Actions to Improve the Equality Evidence Base](#).

### Question 2.1

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

- Fully
- Partially
- Not at all
- Don't know

## Question 2.2

Please set out your reasons for your answer:

The Poverty and Inequality Commission welcomes the opportunity to contribute to this consultation, and the approach taken by the Scottish Government of sharing their initial set of actions for comment, in addition to outlining the broad strategic approach.

The Commission believes that some of these actions will usefully contribute to the ambition for a robust and wide-ranging equality evidence base. More detailed comment on specific actions will follow in response to later questions in this consultation document, but here the Commission will make some over-arching points that, if addressed, will help the strategy to better deliver on its ambition.

The Commission understands the intent behind separating the actions out into topic areas, which largely reflect the administrative structure of the Scottish Government. While this is understandable for the purposes of this consultation document and may be helpful for some users of equality data, it does have the disadvantage of making the approach appear compartmentalised or “siloes”.

Delivering on the ambition behind the strategy will require drawing out insights across the wide range of analytical data collected and published by the Scottish Government, examining overlapping and intersectional inequalities, and bringing different forms of evidence together to allow policy makers to develop sound and inclusive policy.

There is little in the strategy that addresses this. While this is an area in which the Scottish Government’s [equality evidence finder](#) should have a role in bringing analytical content together, there is little discussion in the document of what actions the Scottish Government will take to improve its over-arching approach of bringing equality data together across internal administrative boundaries to add additional value to informing decision-makers.

The final strategy would benefit from content on what SG is doing on this area to drive improvement in integrating equality data across topics, and across government. In particular, outside of actions in particular topic areas, there is little on actions and planning around data linkage across government. Data linkage has the potential to add substantial value to cross-government efforts to make better use of equality data. For example, both Looked after children (Action 1) and Child protection (Action 2) should have CHI number included as part of the data returns, as they already have the Scottish Candidate Number included. If data for these children for those aged over five and now at school could be linked, it could provide valuable insights in understanding their pre-school lives and how it affects their outcomes. There are numerous other examples of where cross-government data linkage could be of value, but there is limited content in this draft strategy to articulate SG’s approach to this.

### Question 3.1

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

- Action 1
- Action 2
- Action 3
- Action 4
- Action 5
- Action 6
- Action 7
- Action 8
- Action 9
- Action 10
- Action 11
- Action 12
- Action 13
- Action 14
- Action 15
- Action 16
- Action 17
- Action 18
- Action 19
- Action 20
- Action 21
- Action 22
- Action 23
- Action 24
- Action 25
- Action 26
- Action 27
- Action 28
- Action 29
- Action 30
- Action 31
- Action 32
- Action 33
- Action 34

Action 35

### Question 3.2

Please set out your reasons for your answer:

The Commission has highlighted the two actions on poverty as “most important” in the draft plan, as they most closely relate to the Commission’s role. However, the Commission has a broad remit and it is not clear from the question if “most important” in this context should mean most important to the Commission and its remit, or most important in terms of the actions having the highest potential to meet the ambitions of the strategy.

If the former, the Commission also considers the following actions to be important in terms of providing equality evidence that the Commission relies upon.

Action 1: Looked after children

Action 2: Child protection

Action 3: Growing up in Scotland

Action 9: Social Security Official Statistics

Action 10: Social Security Scotland Client Survey

Action 11: Scottish Welfare Fund

Actions: 14, 15 and 16 on cross-cutting equality

Action 17: Homelessness

Action 18: Scotland’s Census equality results

Action 25: Scottish Household Survey Transport Components

Action 28: ONS Annual population survey (Labour market and economy)

### Question 4.1

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

Yes

No

Don’t know

### Question 4.2

[For respondents who answer ‘Yes’ to Question 4.1]

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

The Commission welcomes the transparency provided by the inclusion of specific actions under each analytical area, informed by the audit of equality data carried out by SG internally.

While the inclusion of specific equality actions is welcome, the Commission believes that activity in some areas of most interest to its work could be strengthened.

The Commission understands that the intent with Action 13 on Poverty is to conduct a scoping exercise, informed by this consultation. Hence at this stage it is not clear how or whether it will contribute to realising the intended vision of the strategy.

Hence the Commission recommends the following specific additions in relation to poverty Action 13:

- Ensure that poverty data is capable of reporting for all priority families for all four of the targets set out in the Child Poverty (Scotland) Act 2017, whether that is by combining multiple years together, boosting samples, or other technical means. This should include making an assessment of what intersectional analysis can feasibly be provided for poverty rates.
- Ensure the Wealth and Assets dataset has geographic coverage of all of Scotland, as currently it includes nothing north of the Caledonian canal – this limits the ability to draw representative conclusions on wealth and asset inequality.

In addition, for Action 12 (food security data), the urgency of the cost of living crisis and the pressure it will put on family food budgets means that enhanced equality analysis coming by 2025 will be much too late, and the Commission urges the Scottish Government to expedite this process.

### Question 5.1

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

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

- Yes
- No
- Don't know

### Question 5.2

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

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

- **Equality analysis on the eligibility and take-up of free-school meals (FSM):** As part of recent advice on the cost of living crisis to the Scottish Government, the Commission has [published an analysis](#) showing that take-up for FSM is low, particularly for food insecure households. Given that increasing uptake of FSM could help with the urgent cost of living crisis, SG should replicate and confirm the Commission’s initial analysis, using the Family Resources Survey and/or operational data that SG has access to.
- **Social Security Official Statistics:** As well as intersectional analysis the Commission also would like to see analysis by major impairment category. We know that sometimes processes work better for some impairment categories than others (e.g. those with sensory impairments or learning difficulties may experience more/different barriers). Therefore we need to identify differences in outcomes to ensure that barriers are identified and addressed.
- **Social Security Client Survey:** As per the point immediately above, there needs to be a sufficiently large and varied sample size that allows for intersectional analysis and analysis by major impairment group. We know that minority ethnic disabled people, those with learning difficulties and those with mental health issues are all under-represented in the Experience Panels.
- **Dataset: Small Area Statistics on Households and Dwellings:** It would be beneficial if SG could be clearer about what the purpose of action is. The disregards apply to very specific groups of disabled people – those requiring an additional room or kitchen because of their impairment or those with “severe mental impairments”. Not all of those with those particular impairments/conditions will be aware of the disregards or claim them therefore any figures obtained from them will tend to significantly under-represent the number and proportion of disabled people in that area. Hence the Commission would be concerned over accuracy if these were to be used for service or housing planning purposes (though this may not be the intent).
- **Scottish Welfare Fund:** The Scottish Welfare Fund analytical publications should provide analysis by equality characteristic and average value of award by local authority area, so it can be seen whether funding awards to equality groups and geographic regions is at the level that would be expected, or whether it suggests any groups are less well served by the fund. The SWF should also have a client survey, as is the case for Social Security Scotland in order to understand the user experience of accessing the fund.
- **Homelessness data collection:** The homelessness action would benefit from more detail around what the objectives are of the work being proposed. Data on socio-economic class should be gathered in addition to protected equality characteristics. This is also an area (for similar reasons to those mentioned in our response to question 2.2.) where a data linkage approach in order to be able to analyse outcomes for whole families and children where member(s) of the family experience homelessness would add value and help understand the broader impact of homelessness on equality groups.



- **Growing up in Scotland:** The GUS dataset has been used in the past by Commissioners to examine poverty outcomes using a robust longitudinal data source. In the most recent data releases there has been a move to give income data in quintiles – this prevents the data being used to look at poverty over time effectively, limiting the utility of an otherwise important source of data. The explanation that has been provided to Commissioners around this change is that this relates to statistical disclosure control. While disclosure control is an important and necessary process, the Commission would want to see a robust argument that disclosing income data results in a realistic prospect of someone being identified (or other potential harms related to disclosure) that outweighs the benefits provided by allowing poverty analysis of GUS, as this change significantly limits the use of the data in equality analysis.

### Question 6.1

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

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

- Yes
- No
- Don't know

### Question 6.2

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

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

The Commission would welcome the opportunity to collaborate with the Scottish Government on actions that we have commented upon, particularly Actions 13 and 14 on poverty evidence, however we are also happy to provide advice or further comment on any of the actions we have mentioned in this response.

### Question 7.1

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

- Yes
- No
- Don't know

### Question 7.2

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

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

The Commission believes that people with lived experience of the policies that impact upon them should be meaningfully involved in the development of said policies. In the Commission's view, this should also include the development of evidence that informs these policies. This can add value to the process of evidence generation and use, by helping sense check that the right questions are being asked, and that the answers provided are relevant to people's lives and concerns. The Commission would want to see the Scottish Government ensure that lived experience is adequately included in its plans to implement the actions contained in the strategy, particularly on Action 13 on poverty, but also in other topic areas.

### Section 3: Use of equality evidence

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

#### Question 8.1

How often do you or your organisations use equality evidence?

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

#### Question 8.2

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

Which equality evidence sources do you or your organisation use?

The Commission uses a broad range of equality evidence to fulfil its role. In fulfilling its statutory functions in relation to child poverty it relies most heavily on official statistics on poverty, but as in the response to 3.2, we make regular use of equality evidence across a broad range of topics produced by the Scottish Government and other data producers in Scotland.

#### Question 8.3

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

How do you or your organisation use equality evidence?

The Commission draws from a range of equality evidence to scrutinise the actions of the Scottish Government, provide evidence-informed advice, and to advocate for measures that will be effective in reducing poverty and inequality.

In relation to its statutory role in providing scrutiny of the Scottish Government's progress towards Scotland's child poverty targets and advice on what the Scottish Government should do, the Commission analyses data and comes to conclusion on progress in reducing poverty, and whether the Commission considers progress is sufficient to meet the targets. This involves analysis of national level data and progress in reducing poverty amongst population sub-groups.

The Commission uses equality evidence on particular Scottish Government (or other body) policies and actions. It judges whether the evidence provided suggests the policy is having its intended effect, or whether it is not working as well as it could or should, for the purpose of making recommendations about what evidence suggests the best course of future action is.

#### Question 8.4

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

How do you or your organisation usually access equality evidence?

In the first instance, the Commission normally accesses evidence that is publically available, typically online and through the main websites of the organisations that publish said evidence. This is most frequently in the form of published official statistics and research reports. Commissioners also conduct or commission new primary and secondary analysis of official equality data (e.g. original analysis using microdata or evidence reviews).

If the evidence the Commission requires is otherwise unavailable it has the power to formally request the evidence it seeks from Scottish Ministers.

#### Question 9.1

Do you face any barriers to using equality evidence?

- Yes
- No
- Don't know

### Question 9.2

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

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

The Commission's scrutiny of child poverty progress against Scotland's statutory targets is limited by the fact that, while equality analysis of poverty statistics is available for many priority groups, it is not available for all the groups, for all the targets (see response to question 4.2 where we have recommended some options to potentially make this data available).

On occasion, the Commission has faced barriers in accessing evidence through the Scottish Government website. While some sections of the Scottish Government website have clear structures that allows users to see what equality data is available, the quality of this does seem to vary from topic to topic. The design approach to the website appears to encourage the use of the search function to locate relevant equality data, but this does not always seem to return the results anticipated and sometimes does not prioritise appropriately the key sources of equality evidence when returning results in the way we would expect it to.

### Question 10.1

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

- Yes
- No
- Don't know

### Question 10.2

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

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

As per the response to question 9.2, the Commission's scrutiny of child poverty progress against Scotland's statutory targets is limited by the fact that, while equality analysis of poverty statistics is available for many priority groups, it is not available for all.

## Section 4: Equality evidence collection

### Question 11.1

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

- Yes  
 No  
 Don't know

### Question 11.2

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

Which equality evidence sources do you or your organisation produce?

The Commission engages with people with lived experience of poverty and inequality through our [Experts by Experience Panel](#). We discuss our interpretation of equality evidence with the Panel, and work with them to provide recommendations based on it.

As part of its core functions in providing advice and scrutiny to Scottish Government on poverty and inequality the Commission carries out its own analysis of existing equality evidence, this can take the form of interpretation and synthesis of evidence produced by the Scottish Government and other bodies, and also commissioning or carrying out original research ourselves using equality data. We routinely publish the equality evidence we produce (either through advice or scrutiny reports, or stand-alone publications) at <https://povertyinequality.scot/>

### Question 11.3

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

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

- Yes  
 No  
 Don't know

### Question 11.4

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

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

When the Commission carries out analysis of equality evidence based on a secondary analysis or interpretation of existing data, we experience the barriers described in response to question 9.2.