

Executive Team

Date of Meeting	Tuesday 26 May 2020
Subject	Equality Strategy – Next Steps
Agenda No.	5
Paper No.	15.3 a
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Purpose	Discuss

1. Background

1.1 The purpose of this paper is to provide an overview of the recent public consultation on our Mainstreaming Equalities Outcomes and proposed next steps in the fulfilment of meeting our obligations under section 149 of the Equality Act 2010 (the public sector equality duty) and the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended.

1.2 A public consultation on Draft Mainstreaming Equality Outcomes was held between 7 November 2019 and 6 February 2020. We also held a series (nine in total) of public events open to individuals and stakeholder organisations and three staff events. All events broadly followed the same format as the on-line consultation form.

1.3 Rocket Science were commissioned to conduct an analysis of all on-line responses and outputs from the public events. That report as well as discussion with key stakeholders, the three staff events and discussion with Scottish Government colleagues has informed the approach proposed below. The Consultation Analysis report is due to be published shortly.

1.4 This paper was discussed at the Agency Leadership Team meeting on 6 April and the Executive Team on 22 April. Feedback received has been incorporated into this paper.

2. Conclusion

2.1. To support the proposed approach for the next steps in developing our Equality Strategy:

- To publish an initial Mainstreaming Report on progress made to make the general equality duty integral to our functions so as to better perform that duty by August 2020.
- To publish a set of Equality Outcomes which will enable Social Security Scotland to better perform the general equality duty and that suitably

demonstrate the ambition we and our stakeholders have for us to be an exemplar public body.

- To support establishment of two Equalities Networks, membership and purpose detailed below. Draft Terms of Reference available.

2.2 Our approach will address a common criticism made by key stakeholders as to how public bodies link available data to the monitoring of progress. As detailed below, we will make more explicit use of available data in the re-writing of the specific outcomes, the on-going monitoring and challenge via the feedback from the Networks and utilising a more engaging style when publishing the required data on our new website.

Link to Corporate Objectives

Strategic Objective	Contribution
<p>Dignity, fairness and respect</p> <p>Delivering a service with dignity, fairness and respect at its core.</p>	<p>The approach proposed will support our people to keep our values at the centre of our way of working.</p>
<p>Equality and tackling poverty</p> <p>Promoting equality and tackling poverty.</p>	<p>The development of Social Security Scotland's Equality Strategy is one of the actions we will undertake to achieve this strategic objective.</p>
<p>Efficiency and alignment</p> <p>Ensuring efficiency and aligning our activities with wider public sector for the benefit of the people we serve.</p>	
<p>Economy, society and environment</p> <p>Contributing to our economy, society and protection of our environment.</p>	

Impact Assessment

With the first report we will include the initial analysis of our Equality Monitoring and Feedback Form completed by clients and the workforce diversity statistics. (initial report was published on 31 March). This information will be vital as we undertake Equality Impact Assessments across the organisation.

While an Equality Impact Assessment has not been formally undertaken for this strategy, it is expected that they will be carried out to support the actions we take underpinning its delivery as this is where they will have greatest impact.

The Equalities Network (External) we propose will also act as a challenge for future Equality Impact Assessments. Members will have an opportunity to comment on all drafts and have an assurance mechanism to make sure any action identified by them is delivered.



We have also completed an Islands Screening Statement and this will be published alongside the Mainstreaming Report.

Strategic consideration	Impact
Environment	
Governance	
Data	
Finance	
Staff	
Equalities	This proposed approach is key to fulfilment of our Public Sector Equality Duty
Estates	
Communications and Presentation	An engaging, inclusive and transparent presentation of our equalities data, actions and process is critical to our credibility with stakeholders and the public.

Social Security Scotland Equality Strategy – Next Steps

1. Context

Equality is front and centre of the Social Security (Scotland) Act 2018, and this focus has continued in our approach as we grow and develop as a new Executive Agency. This is clearly demonstrated with Equality and Tackling Poverty as one of our strategic objectives within the Interim Corporate Plan.

In November 2019, it was agreed that we would conduct a public consultation on our draft Mainstreaming Equality approach and set of outcomes.

We expect our first report to be published later in 2020 with a requirement that progress reports are published every two years thereafter. Our set of equality outcomes is required to be reviewed every four years.

2. Strategy Development

The Corporate Assurance function has been leading on the organisations corporate response to equality related matters and formulating our strategic approach. To inform our initial response we established an Internal Equalities Group, undertook an equality event with external stakeholders in Edinburgh and reviewed Experience Panel research. Together, this helped us shape the Draft Equality Outcomes that we agreed would benefit from further public consultation.

A three month public consultation was undertaken and this was supported by nine events for public and stakeholders and three staff workshops (one Dundee, one Glasgow, one Virtual). We also presented at a consultation event hosted by The Alliance, received detailed feedback from an event hosted by Glasgow Disability Alliance and had individual meetings with some key stakeholders.

Rocket Science were commissioned to analyse responses received on-line and from the public events. Eighty-one respondents provided responses to the consultation through standard, non-standard and easy read format. Attendance at the nine public events varied from four to thirty-four, numbers at the staff events varied from four to ten.



3. Meeting our Legislative Requirements

Under the Equality Act 2010 we have a range of statutory obligations, and this is followed on with specific equality related obligations within the Social Security (Scotland) Act 2018.

The Specific Duties include a requirement to:

- report on mainstreaming the equality duty;
- publish equality outcomes and report progress;
- assess and review policies and practices;
- gather and use employee information;
- use information on members or board members gathered by the Scottish Ministers;
- publish gender pay gap information;
- publish statements on equal pay;
- publish in a manner that is accessible,
- consider award criteria and conditions in relation to public procurement.

Mainstreaming the equality duty has a number of benefits including:

- equality becomes part of the structures, behaviours and culture of an authority
- an authority knows and can demonstrate how, in carrying out its functions, it is promoting equality
- mainstreaming equality contributes to continuous improvement and better performance.

Central to mainstreaming is the gathering and consideration of relevant data. A common criticism of the implementation of the public sector equality duty has been the lack of clear links between data collected and analysed and the reporting on progress and setting and monitoring of specific outcomes.

Our approach is to develop a Social Security Scotland Equality Strategy. This strategy will encompass our mainstreaming actions and progress and a distinct set of equality outcomes appropriate to a new public body that is still growing.

We will make links to the Scottish Government equality outcomes and approach and incorporate those existing actions detailed with specific actions plans. These include actions within the Race Equality Action Plan, the Gypsy/Traveller Action Plan and the Gender Pay Gap Action Plan.

Our Equality outcomes will detail the results we aim to achieve in order to further one or more of the three needs of the general equality duty, to eliminate discrimination, advance equality of opportunity and foster good relations. Overall, our set of Equality Outcomes will state the specific and identifiable improvements we want to achieve for those who experience discrimination and disadvantage. They will apply to our work as an organisation and as a delivery body.

4. Feedback

A full copy of the Rocket Science report is available as a separate attachment. However the feedback received covered general points about our approach alongside specific comments on the wording and detail of the proposed equality outcomes.

Ambition – going beyond the protected characteristics

Overall, there was broad consensus for more focused and ambitious outcomes that go beyond just looking at protected characteristics as defined within the legislation. This includes consideration of the experience of carers, those living in rural and/or island communities and those experiencing poverty or from more disadvantaged socio-economic backgrounds.

There was also a strong view that we need to clearly define the desired impact on people with protected characteristics and even more importantly those who have more than one protected characteristic. This intersectionality is known to have exponential consequences and requires recognition and action particularly as it affects a significant proportion of our current and future clients.

Views of how inclusive and seamless a service is will be determined by a range of indicators including:

- Attitude of staff – patience, understanding, communication skills, kindness and empathy
- Knowledge of staff – of different communication needs and how they can be met through assistive technology, communication support etc.
- Continuity of support – what is the client's experience if their circumstances change e.g. if they move to another local authority area or if they lose information e.g. forgetting an online password
- How comprehensive is the range of communication channels – free telephone helplines, easy read materials; BSL support etc.
Will all the information supplied to clients be jargon free and written in plain English?

Inward and outward facing outcomes

Another area that generated a lot of comment was the need to separate those outcomes that referred to Social Security Scotland as an employer and those that were about us as a service provider/delivery body.

“Less inward facing – if outcome is to be about Social Security Scotland and not how it delivers (public, customers, families) then be explicit.”

Many respondents felt that the outcomes should be more about the delivery aspect and were less interested in what we did internally. Others were of the view that if we didn't get the “people” right and generate and maintain a positive, learning organisational culture we would be unable to deliver in a way that met or exceeded our equality ambitions. There was a view that we need to be more explicit in describing how we will be a “different type of public body”.

Choice of words, tone, detail

Wording and the language used for the outcomes was an issue for many respondents. Understandably there was a strong view that the document should contain no jargon or acronyms. However, the comments on wording were also about tone and focus.

It was felt that wording could be improved to be more specific and that outcomes could be written with more clarity in how they were to be achieved. This would be done by outlining the situation and need of certain groups first, then detailing the change required, describing a rationale, detailing the activities and strategy to achieve this and finally, describing in detail the means of measuring success of each activity and outcome.

Specific words prompted much discussion. This also links to overall tone and how much Social Security Scotland wished to be understood as a different type of public body.

Wording – “diversity is welcomed” “diversity is celebrated”

“Don't use word “different or differences”

“our people” – is that all of us or just you”

“get the financial support that they are entitled to ”

Be specific and detailed – “demonstrate that you know your clients and your staff and what you want the future to look like.

Respondents wished to see specific protected groups be explicitly mentioned in the overall outcomes as well as the activities and measures of success.

It was mentioned often by respondents that the outcomes should explicitly acknowledge the inequalities some groups (people with protected characteristics) face and the disadvantages they therefore face in terms of accessing welfare benefits. By doing this for each group (protected characteristic/several protected characteristic), Social Security Scotland could then outline specific, relevant and

time-bound outcomes which are achievable through activities which could be measured.

Continued involvement

Respondents wished to see more involvement of groups with protected characteristics and for that involvement to be on-going.

There was broad support for the involvement that had been undertaken thus far but many felt that the on-going development of our approach to mainstreaming equality and delivery of actions provided offered an opportunity to step up the nature of involvement.

Suggestions included, disabled people to undertake access audits of proposed locations of local delivery sites and offices and to assess local transport routes for accessibility. Locations also have to be assessed in regard to suitability for the full range of impairments and not just focus on physical access issues. Consideration could also be given to supporting those with lived experience to undertake “mystery shopper” reviews.

Staff training has to be developed in partnership with those with lived experience of the barriers faced by protected groups. Ideally individuals with lived experience should be involved in the delivery of training.

Members welcomed the proposal to offer tailored pre-application support throughout local delivery areas and would be interested in exploring how family members, carers, advocates and other client representatives can be involved in this process.

Proposed Approach

The feedback received clearly states support for Social Security Scotland to go beyond the minimum in meeting our obligations under the legislation. This ambition goes beyond the inclusion of people who share one or more protected characteristic.

Our approach to creating our Equality Strategy will encompass the embedded values of Social Security Scotland and the principles of continuous improvement, inclusive communication and voices of lived experience.

Our first Equalities Mainstreaming and Outcomes plan (Equality Strategy) will set out our equality ambitions, actions and outcomes for the next two years.

We recognise that Social Security Scotland is an organisation defined by constant change and there may be other outcomes needed over the course of this plan. The proposal to establish two Equality Networks (one internal, one external) will assist in the need to continually review and re-assess our approach and progress.

In response to feedback, the new structure will clearly detail which of the three equality duties the outcome refers to and state the intended impact on people with specific protected characteristics. This approach will support our need to actively reference all elements of our organisation including but not limited to relationships with core Scottish Government functions, our developing Local Delivery service and

stakeholder relationships, National Engagement and Experience Panels and developing Staff Networks.

We will convey our on-going commitment to a humans-rights approach and how we will include those who share more than one protected characteristic and/or are a carer or affected by poverty. This will be achieved by having a clear vision statement, incorporating our values and reflecting the aims of Our Charter. Furthermore the proposed development of a comprehensive framework to reflect “our way of working” will bring to the fore the vision detailed within Our Charter as to the way we delivery our service, work with others and support our people.

Our approach will demonstrate our understanding of having and using different forms of data to inform and monitor progress. To ensure all actions are evidence-based and progress is monitored via that evidence base. We are in a fortunate position as a new public body to have a wealth of statistics and social research to draw on and to engage with in the development and monitoring of our progress. These include: equality data collected during application process, Client Survey, People Survey, IPSOs Mori research and the Seldom Heard Programme of Research.

Recommendations.

Our recommendations are as follows:

- To publish a Mainstreaming Equality Report that details our current and future commitment to the legislation and the equality related actions within Our Charter.
- To develop a set of Equality Outcomes that will individually and collective demonstrate the ambition of Social Security Scotland in the on-going development and delivery of organisation as an exemplar public body.

Together these documents will constitute our Equalities Approach.

- To establish an Equalities Network (Internal) - comprising representatives of Social Security Scotland and with links to Social Security Directorate and Scottish Government Equalities Unit who can build expertise throughout Social Security Scotland and help ensure that equality is considered routinely.

Additional tasks include:

- (1) co-ordinated responses to and involvement with core Scottish Government colleagues on related Scottish Government wide equalities-related Action Plans
- (2) to co-ordinate support required for the completion of Equality Impact Assessments
- (3) to analyse the various internal data sources to identify trends, patterns and issues.



(4) to develop a Framework that explains and demonstrates how we work. This Framework will incorporate core principles such as those detailed within our Inclusive Communications commitment, having a Trauma-Informed approach and including the voice of experience.

- To establish an Equalities Network (External) – comprising representatives of key stakeholder organisations to provide the critical challenge and informed lived experience of specific protected characteristics to ensure our approach is proportionate, relevant and is underpinned by an intersectional understanding.