

Respondent Information Form

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy in ANNEX A

Are you responding as an individual or an organisation?

- ☐ Individual
- ☒ **Organisation**

Full name or organisation's name and sector

City of Edinburgh Council

Phone number

Address

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- ☐ Publish response with name
- ☐ Publish response only (without name)
- ☐ Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- ☐ Yes
- ☐ No

Questionnaire

Question 1

Do you agree with the vision?

- ☒ YES
- ☐ NO
- ☐ DON'T KNOW

Please explain your answer or provide further information.

The vision is in line with our organisational ambition to embed systemic change to how we deliver core services. Recent engagement with local equality and human rights stakeholders in Edinburgh echoes the importance of the need for systemic change in public bodies.

Question 2

Do you agree with the objectives?

- ☒ YES
- ☐ NO
- ☐ DON'T KNOW

Please explain your answer or provide further information.

The intersectional approach is aligned to recent engagement findings too, although as an organisation the current resources, skills and data collection available to apply intersectional analysis and approaches to all our services are lacking, and financial support/guidance to do this successfully would be required.

Question 3

Do you agree that strengthening leadership is a key driver for mainstreaming equality and human rights?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

We have made progress towards engagement and support of our council leadership team to drive our equality and human rights activity in the organisation, but further support and guidance to do this would be welcomed.

We have a Member Equality Working Group made up of cross-party elected members who work with officers to review and drive the equality workstreams within the organisation but support to strengthen the knowledge of elected members to allow them to scrutinize work more effectively would be welcome (appreciating that the landscape for equalities is ever evolving).

Question 4

Do you agree with the focus on different levels of leadership?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes. It is crucial that all those levels are included however, senior management and those with strategy design, budget and service delivery responsibilities should also be included in this. Given the size of public bodies, it is crucial that senior and middle management are informed and equipped to deliver on this strategy through standardised tools and approaches set out in this strategy.

Question 5

Have we captured the core elements of strengthening leadership within the context of mainstreaming?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes, however level of priority could be changed e.g. ***ensure that work to advance equality and human rights is adequately resourced and protected*** should be the main priority as to achieve the other core elements this is required.

Question 6

What actions would you recommend to ensure strengthening leadership as outlined above will contribute to mainstreaming?

The creation of support/guidance/training for all those with wider budgetary and service/strategy design, implementation and monitoring would be welcomed. The skills to apply equalities and human rights into practice are different from those at executive leadership level.

Question 7

Do you agree accountability and transparency are a key driver for mainstreaming equality and human rights?

☒ YES

☐ NO

☐ DON'T KNOW

Engagement with stakeholders has highlighted a general mistrust of authorities. To foster good relations and work effectively with our communities, we need to ensure that our processes are transparent. The success of this work is dependent on being transparent and accountable.

It is important that our progress towards equality is recorded and available in accessible formats.

Please give reasons for your answer or provide more information.

Question 8

Have we captured the core elements of accountability and transparency within the context of mainstreaming?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes, however we would ask that these remain under review throughout the lifetime of the strategy to ensure that any evolving workstreams are aligned and embedded to avoid further silos.

Question 9

What actions would you recommend to ensure greater accountability and transparency contributes to mainstreaming?

Clear guidance on accountability and transparency would be welcomed, alongside the standardisation of monitoring and reporting tools. Whilst it is good to have local-level autonomy to report on the current (mainstreaming, equality and human rights strategies and equality outcomes) delivery, this requires a lot of resource and creates silo reporting structures.

Question 10

Do you agree that ensuring an effective regulatory and policy environment is a key driver for mainstreaming equality and human rights?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes, ensuring an effective regulatory and policy environment is a key driver for mainstreaming equality and human rights. If the regulatory and policy environment is not effective, it will not be a key driver for this goal.

The specific duty to assess impact helps us mainstream equality and rights into our policies and decision-making processes.

Question 11

Have we captured the core elements of ensuring an effective regulatory and policy environment within the context of mainstreaming?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes, we would welcome collaboration with the Scottish Government to ensure new and revised regulations and policies respond to challenges and make positive change. In particular, we would welcome guidance from the Scottish Government to exercise the use of regulation 11, when there is a strong evidence base to utilise this regulation.

Further training, as mentioned in the document, is fundamental but financial support/guidance from the Scottish Government to deliver this successfully would be required.

Question 12

What actions would you recommend to ensure that an effective regulatory and policy environment will contribute to the achievement of mainstreaming?

Adequate funding and resourcing for the regulatory and policy environment would contribute to this goal.

Question 13

Do you agree that utilising evidence and experience is a key driver for mainstreaming equality and human rights?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Utilising evidence and experience is the key. Ensuring that we are building up the knowledge to use the blended data sources to gain insight will be a key driver to support the mainstreaming of equality and human rights.

Recent engagement with stakeholders and those with lived experience (lived experience panels) has indicated that those with protected characteristics are keen to continue and increase engagement with local authorities and partner agencies.

However, engaging with communities, and collating and analysing data is the most resource intensive and under resourced part of mainstreaming equalities within the organisation at present. It is therefore essential that local authorities are equipped to collate and analyse this data effectively and therefore need to receive adequate financial support from the Scottish Government.

Question 14

Have we captured the core elements of utilising evidence and experience within the context of mainstreaming?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes, setting out the expectation of utilising a wide range of different sources of data to enable a complete picture to be considered is helpful.

As outlined in the document, hearing from people with lived experience should be a key source of evidence. However, challenges will remain in converting these individual experiences into a global perspective which can drive policy/legislation.

In Edinburgh we work very closely with the Equality and Rights Network which we fund and this has been proven to be successful when engaging with our stakeholders.

Question 15

What actions would you recommend to ensure that utilising evidence and experience as outlined above will contribute to the achievement of mainstreaming?

To ensure that the focus of any gathering of data/evidence is on gaining insight rather than 'useful to know' so that the resource required is focused on the right things.

In addition, ensure that the representation of panel members is reflective of people across Scotland so that it is relevant to the work of public bodies across Scotland, and that this is disclosed in the publication of any findings/evidence where possible.

It is likely that equality issues vary from region to region across Scotland and at present, officers in Edinburgh are having to do further local-level engagement on equality issues to address gaps or absence of available evidence.

Question 16

Do you agree that enhancing capability and culture is a key driver for mainstreaming equality and human rights?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes, equipping all public sector staff with the skills, knowledge, and motivation to fully integrate equality and human rights into everything they do will have a positive impact on our approach to recruitment and promotion; performance management; and professional development, career progression and talent management.

There are indications that at present, we are not making full use of existing diversity objectives. Therefore, it is unclear if this is something that can be built on.

Question 17

Have we captured the core elements of enhancing capability and culture within the context of mainstreaming?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes, however, it presents significant challenge to guarantee that all public sector employees have 'just in time' access to the appropriate development opportunities, guidance and tools exactly when they need them. This work will require the establishment of clear frameworks setting out the depth of knowledge necessary for various roles and responsibilities within the sector.

Question 18

What actions would you recommend to ensure that enhancing capability and culture as outlined above will contribute to the achievement of mainstreaming?

There needs to be more emphasis on addressing socio-economic disadvantage throughout all documentation as well as within the and the toolkits / frameworks.

Additionally, it would be beneficial to consider providing learning opportunities at national level to reduce duplication of effort across local authorities.

Question 19

Do you agree that this Strategy will provide a foundation to influence a culture of mainstreaming equality and human rights within Scottish Government and the wider public sector?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes. It has the potential to provide a foundation to influence a culture of mainstreaming equality and human rights within the public sector. However, sufficient allocation of resource to make this happen will be a key factor in its success.

Separating capability from capacity is a helpful approach.

Question 20

Do you agree that improving capacity is a key driver for mainstreaming equality and human rights?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

This is fundamental to success as without sufficient resource, staff and time capability cannot be translated into change of culture, as is highlighted in the document.

Question 21

Have we captured the core elements of improving capacity within the context of mainstreaming?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes, distinction between capability and capacity is well set out in the document. It is vital to invest in civil society and to strengthen the relationship between civil society and public sector in order to deliver on the strategic vision.

Question 22

What actions would you recommend to ensure that improving capacity will contribute to the achievement of mainstreaming?

Ensuring capacity to continue to deliver key services while creating space and time to focus on mainstreaming equality will be a challenge and one which should be addressed at the planning / resourcing stage.

Question 23

Do you think the proposed approach to a collated Action Plan will drive change?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes, collating key strategies and cross-cutting themes nationally will help us to implement change locally.

Question 24

Do you think there is a need for a cross public sector toolkit to support mainstreaming of Equality and Human Rights?

☒ YES

☐ NO

☐ DON'T KNOW

Please give reasons for your answer or provide more information.

Yes. To ensure that all local delivery of this strategy can be delivered in line with this new strategy, public bodies will require clear guidance around the expectations on them to deliver and report effectively. Given that public bodies work together locally to deliver on these strategies (formally or informally) at present, it would make sense to create a toolkit that works for all public bodies.

Question 25

What practical steps would you include to make the toolkit an effective resource?

Engage with public bodies when creating this toolkit to identify the gaps where they most need support and guidance in place. The City of Edinburgh Council would welcome sitting on a working group to develop this toolkit.

Question 26

What are your views on additional reporting requirements?

☒ Additional stand-alone reporting requirements should not be created

☐ Additional stand-alone reporting requirements should be created

☐ Don't know

Please give reasons for your answer or provide more information.

Additional reporting should not be implemented as it would lead to further confusion in an already complex reporting landscape. This is due to the resourcing issues mentioned above - and the need to align reporting of various equality and human rights work to properly tackle inequality across workstreams. Alternatively, a standardised reporting template or clearer guidance that would allow public bodies to report more effectively on all activity within the new strategy would be helpful.

Addressing socio-economic inequalities is key to this work. Poverty must be addressed in the first instance to reduce inequality affecting protected groups.

Question 27

To what extent do the drivers capture the full range of activity required to mainstream equality and human rights?

- ☐ Captures the full range
- ☐ Captures most of the range
- ☒ Captures some of the range
- ☐ Does not capture any of the range

Please give reasons for your answer or provide more information.

The development of the new strategy, toolkits and support/guidance are welcome however the main concern is around the resource to effectively implement this within public bodies that are facing budget cuts on an annual basis. The consultation lacks detail regarding the resource and funding that would be available to implement the full range of activity set out in this consultation and this needs to be considered within the scope and development of this strategy.

Question 28

Please provide any further information that you think would be useful, which is not already covered in your previous responses, in the box below.

The Scottish Government might also be interested in the following:

- We need to improve the ways in which we collect data, particularly in relation to hate crime, to ensure that it is reflective of the experiences of the community and colleagues. The Edinburgh Community Safety and Justice Partnership is currently reviewing the [Joint Community Safety and Antisocial Behaviour Strategy](#) and it is anticipated that a multi-agency approach to tackling hate crime will be embedded throughout which includes improvements to data collection.

Other points of interest

- We acknowledge that there is an easy read version available, and we appreciate the opportunity to engage with Scottish Government on your strategy development. However, it must be noted that a more accessible version would have aided our responses. Additionally, the formatting created leading questions at times and we have tried to remain neutral in our responses.

ANNEX A

Privacy Notice

Equality, Inclusion & Human Rights Directorate

1. Who we are

The Scottish Government, Equality, Inclusion and Human Rights Directorate. Our head office is located at Area 3H – North, Victoria Quay, Edinburgh EH6 6QQ.

2. Why we need your personal information

To analyse responses to the public consultation on the Equality, Inclusion and Human Rights Mainstreaming Strategy. This will inform the Scottish Government's efforts to tackle inequality and advance equality of opportunity.

3. What is our lawful basis

Article 6(1)(e) of the UK GDPR - Processing is necessary for performance of a task carried out in the public interest.

Article 9(2)(g) of the UK GDPR - Processing is necessary for reasons of substantial public interest, on the basis of UK law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject.

Processing data in consultation responses is also necessary for the Scottish Government to comply with its public sector equality duty under section 149 of the Equality Act 2010.

4. What we do with your data

Consultation responses will be analysed by an appointed contractor. Any personal data or special category data will be anonymised or pseudonymised before analysis. The final published report will not contain any data that could identify individuals, unless you have explicitly consented to your name being published alongside your response.

5. How long is your data kept

Personal data will be retained only as long as needed for analysis purposes and then securely deleted no later than December 2024.

6. What are your rights

You have a right of access to any personal data we hold about you by making a [Subject Access Request \(SAR\)](#).

In addition, if you believe that the data we hold is inaccurate or incomplete you can ask us to update our records by contacting MainstreamingStrategy@gov.scot

To find out more about the rights you have over your personal data, please visit the ICO website [Your data matters | ICO](#)

7. Complaints

If you have concerns about the way we process and handle your personal information, in the first instance you should raise your concerns with our Data Protection Officer by email to DataProtectionOfficer@gov.scot