**Review of National Outcomes: call for evidence**

The Coalition for Racial Equality and Rights is a Scottish anti-racism charity based in Glasgow. We are focused on working to eliminate racial discrimination and promoting racial justice across Scotland. Our response here to the Scottish Government’s call for evidence on the National Outcomes relates to both the National Outcomes, National Indicators and the National Performance Framework (NPF) more widely. We have submitted both this response and our 2020 publication ‘Scotland’s National Performance Framework: Measuring outcomes for minority ethnic communities’[[1]](#footnote-1) to the call for evidence.

CRER view the National Outcomes, and the NPF as a whole, as a potentially valuable tool to measure progress on race equality and wellbeing for Black/minority ethnic (BME) people across Scotland. However, currently, the NPF is not fit for this due to inadequacies in both what is being measured (there is no metric which specifically relates to race equality) and a lack of both data availability and equality analysis for National Outcomes. Our aforementioned research on NPF found:

* Five National Outcomes had no indicators with ethnicity data on Equality Evidence Finder. Two of these outcomes are key areas with known inequalities for BME groups (poverty and health), where an up-to-date evidence base is absolutely crucial to drive progress
* 65% of National Indicators (26 out of 40) did not have ethnicity data on Equality Evidence Finder. For the vast majority of these indicators, the provision of ethnicity data could reasonably be expected
* Some of the data on Equality Evidence Finder was of poor quality, for example not up-to-date or without an explanation of ethnicity categories used
* Data on Equality Evidence Finder was generally not disaggregated by individual ethnic group, meaning that differences in outcome for the wider range of BME groups cannot be accurately measured or addressed

Whilst there has been some minor improvement in data availability since 2020, the report findings remain valid. As minority ethnic communities are not properly served by the NPF as it currently stands, reform is urgently needed; continuing with an approach which fails these communities would be a clear indication of institutional racism.

The First Minister, Humza Yousaf, has said “that it is not enough to simply not be a racist – we must be loudly and unequivocally anti-racist”. The Scottish Government have stated that they are proud to be anti-racist and want Scotland to play its part in eradicating racism, inequality and injustice. However, at present this cannot be seen within the framework, which is supposed to represent the government’s ambitions for society and the values that guide its approach. The commitment to anti-racism needs to be threaded through the framework, in every outcome and indicator, as well as being reflected as a key value. As a start, within the Human Rights National Outcome (‘We respect, protect and fulfil human rights and live free from discrimination’) and the associated vision, there should be an explicit reference to anti-racism.

Of relevance, the UN’s Sustainable Development Goals (SDGs), which were the basis for a recent refresh of NPF, have been criticised for shallow commitment to racial justice and equality. The UN Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance has stated that: “Racial justice commitments are largely absent from the operationalisation of the SDGs, as seen through the lack of racial disaggregation in the SDG Targets and Indicators … The persistent lack of resources, failure to collect disaggregated data and dearth of political willpower still limit progress toward racial justice in virtually all national and international contexts.”[[2]](#footnote-2) At present, these comments could reasonably be said to encompass Scotland’s use of the SDGs through the NPF, which has little relevance to racial justice in Scotland. This provides additional motivation for the Scottish Government to reflect on how the NPF, at present, is serving BME communities and working towards tackling racism in Scotland.

Our perspective is that it is not possible to build a wellbeing economy where racial inequalities are not tackled and, therefore, tangible progress in this area is crucial for many of the National Outcomes. To this end, we have proposed improvements to data collection, increased policy coherence with the Race Equality Framework 2016-2030 and three new National Indicators to be added:

* Ethnicity Employment Gap
* Relative Poverty in all Child Poverty Priority Families
* Experience of Discrimination

An improved race equality focus in the NPF would help shape race equality policymaking across the Scottish Government. We believe that these proposed National Indicators align with the Scottish Government’s priorities and are both measurable and feasible. However, if the Scottish Government wants to look more broadly at reframing the framework to be anti-racist, we are happy to discuss further opportunities for outcomes and indicators. Additional opportunities for improvements may come from the upcoming Equality and Human Rights Mainstreaming Strategy.

**Proposed New National Indicators**

**‘Ethnicity Employment Gap’ under ‘Fair Work and Business’ National Outcome**

The employment rate of minority ethnic people in Scotland is consistently lower than the employment rate of white people. This disparity is down to employment barriers connected to structural, institutional, and interpersonal racism within and across various organisations and employment sectors in Scotland.[[3]](#footnote-3)

Tackling racial inequalities in employment is a crucial element of the fair work agenda, as well as being a key value within the Race Equality Framework 2016-2030. The addition of a relevant indicator around race equality in the workplace would give a fuller picture of the progress Scotland is making on fair work for everyone and align with several of the NPF aims, including on increasing opportunities and reducing inequalities.

The precise statistic to be used for this indicator would be the employment gap between minority ethnic and white people in Scotland. For example, this currently sits at 11.7%. The statistics needed for this potential indicator are already collected through the Annual Population Survey and therefore would not represent an additional cost.[[4]](#footnote-4) These are meaningful statistics which are relatively straightforward to interpret, and through which change over time can be seen.

BME women continue to face serious barriers in access to work, including racist and sexist attitudes and discrimination which is represented by a higher employment gap. Therefore, an ethnicity employment gap indicator must also be able to be broken down by gender and progress in this area should be a key discursive point on the progress (or lack thereof) of the indicator. Due to significant disparities between minority ethnic groups, data for this indicator would also need to be broken down to specific ethnicities, matching Scotland’s census ethnicity categories.

This indicator would complement current actions by the Scottish Government and this review represents an opportune moment to introduce this indicator following the publishing of the Scottish Government’s Anti-racist Employment Strategy in December 2022.[[5]](#footnote-5) To the extent that priorities are driven by the NPF this could add additional focus, attention and drive to the already existing work on tackling race and employment barriers in an outcomes focused manner.

**‘Relative Poverty in all Child Poverty Priority Families’ under ‘Poverty’ National Outcome**

The Scottish Government have identified several ‘priority families’ who are more at risk of poverty and who should be prioritised in anti-poverty strategies and delivery:

* Disabled person in household
* 3+ children in household
* Baby aged under 1 in household
* Minority ethnic household
* Lone parent household
* Mother aged under 25

An additional indicator could be added under the poverty national outcome which looks at progress in tackling poverty rates for these groups. Whilst this is not a single measure indicator, this is not without precedence (for example, the educational attainment indicator has seven sub-measures).

The data needed for the proposed priority families indicator is already published by the Scottish Government.[[6]](#footnote-6) However, as we have called for in the past, the minority ethnic families data needs to be broken down by specific ethnicities.[[7]](#footnote-7)

This indicator would align with Scottish Government’s priorities on child poverty, including the targets which have been set.[[8]](#footnote-8) It could encourage progress by raising the profile of the priority groups and highlighting the need for targeted action at a local and national level to reduce poverty within these groups.

**‘Experience of Discrimination’ under ‘Human Rights’ National Outcome**

Discrimination and harassment towards minority ethnic people is a significant problem in Scotland; racial hate crime remains the most reported hate crime in Scotland, with 3,285 charges reported in 2020-2021, which is almost 9 charges being made a day. This is despite known issues with underreporting. Additionally, non-criminal forms of discrimination are a major underpinning factor in other areas of racial inequality, including racialised health inequalities, disparate labour market outcomes and housing inequalities.

However, experience of discrimination is currently a missing element of the NPF. Given that the human rights National Outcome directly references discrimination: ‘Respect, protect and fulfil human rights and live free from discrimination’ and there is a recommended indicator within the SDGs of ‘Proportion of population reporting having personally felt discriminated against or harassed in the previous 12 months…’,[[9]](#footnote-9) it is not clear why this is not already an indicator.

The data for this potential indicator is already available through the Scottish Household Survey, which is a robust source of evidence on experiences of discrimination and harassment. The question asks ‘Have you personally been unfairly treated or discriminated against in Scotland in the last 12 months, for any of the following reasons’ and ‘Have you personally experienced harassment or abuse in Scotland in the last 12 months, for any of the following reasons’.

To be meaningful, an indicator on experience of discrimination must be accompanied by ethnicity data and this should be broken down by specific ethnicities where possible.

**Community Consultation and NPF’s interaction with Race Equality Policy**

The Community Empowerment (Scotland) Act 2015, which puts the NPF on a statutory footing, requires Scottish Ministers to consult on, develop and publish a new NPF every five years. There is a requirement to consult communities, including communities of interest, and to have regard to the reduction of inequalities of outcome resulting from socio-economic disadvantage when determining national outcomes. Of relevance, BME groups are disproportionately at risk of poverty: data shows that people from BME groups in Scotland are twice as likely to be in poverty as their white counterparts. Children from minority ethnic households are at the highest risk of facing poverty of any of Scottish Government’s child poverty priority groups, and the rate continues to rise.

More than fifteen years since the first iteration of the NPF, it is not clear to what extent BME communities have been consulted in the lifetime of the NPF[[10]](#footnote-10) and the current set of indicators are not designed to or able to measure racial inequalities. In the assumed absence of meaningful engagement with BME communities, it may be possible to make use of the Race Equality Framework 2016-2030 (REF) to fill in some gaps (though this is not to say that this can replace consultation specifically on BME people’s views on the NPF/National Outcomes, Scotland’s future and what wellbeing in this context entails) and make the National Outcomes more relevant for all people in Scotland.

The REF sets out the Scottish Government’s approach to promoting racial equality and tackling racism and is based on the priorities, needs and lived experiences of Scotland’s minority ethnic communities which was achieved through a thorough consultation process.[[11]](#footnote-11) Attention should be paid to the key areas of the REF to see where priorities for change are for BME communities and these should be used to feed into national indicators and data improvements.[[12]](#footnote-12) In addition to reflecting the priorities already identified through consultation on the REF, in order to correct the pattern of ‘race blind’ policy making, this present consultation must place additional emphasis on the views put forward by CRER and other organisations representing the interests of minority ethnic communities.

On policy cohesion, at present, the interaction between Scottish Government race equality policy and NPF outcomes is impossible to discern due to a lack of relevant National Indicators, equality analysis and ethnicity data. However, if proactive changes are made in these areas, it should be possible to see how policies and actions by the Scottish Government on race equality contribute to and interact with indicators and outcomes across the NPF. This would increase policy cohesion and enable the NPF to begin to become an outcomes focused tool driving towards an anti-racist Scotland.

**Improvements on Ethnicity Data for National Indicators**

The coronavirus pandemic exposed racial inequalities in the UK, which resulted in marked differences in COVID-19 related hospitalisation and deaths, alongside disparate negative financial impacts such as loss of income. The pandemic also highlighted the critical nature of the collection of ethnicity data as, initially, public bodies were unable to say whether there were racial inequalities in COVID-19 death rates in Scotland.[[13]](#footnote-13)

The Expert Reference Group on COVID-19 and Ethnicity, established by Scottish Government, made several recommendations on reporting data by ethnicity. One of these was: “The National Performance Framework must include specific indicators on the impact of racialised inequalities or the impact of systemic racism on minority ethnic people to supplement the current 81 National Indicators”.[[14]](#footnote-14)

Presently, very limited numbers of the NPF indicators are published disaggregated by ethnicity. The lack of data in this area hampers equality analysis of the framework and diminishes the possibility to use the NPF as a tool for anti-racist policy making. The significance of this issue is beginning to be recognised. Recently, Emma Roddick MSP, Minister for Equalities, Migration and Refugees personally assured CRER that this is a priority, stating the importance of addressing the remaining gaps and standardisation issues with ethnicity data, particularly around reporting on the NPF, and on ensuring granular disaggregation of data to match Scotland’s Census ethnicity categories.

CRER’s 2020 report on the NPF concluded that the volume of national indicators that cannot be disaggregated by ethnicity demonstrates that the NPF is not currently functioning in a way that enables measurement of progress for minority ethnic people and that this fact, in itself, can be seen as a racial inequality. [[15]](#footnote-15) Despite slight improvements that have been seen on data availability in the three years since this report was published and the publication in March 2023 of a refreshed Equality Evidence Strategy which runs until 2025,[[16]](#footnote-16) the results of our research on NPF and data remain valid.

Committed funding and support to gather high quality ethnicity data for all relevant National Indicators, alongside improvements to Equality Evidence Finder, will be critical if the National Performance Framework is to drive change towards and contribute to anti-racist policymaking.

1. CRER (2020) [Scotland’s National Performance Framework: Measuring outcomes for minority ethnic communities](https://static1.squarespace.com/static/615c1bee105b4f55a98326d0/t/61682e524b42ba4be073827c/1634217556637/02_Scotlands_National_Performance_Framework.pdf) [↑](#footnote-ref-1)
2. United Nations (2022) [Sustainable development programmes characterised by shallow commitment to racial justice and equality, warns UN expert](https://www.ohchr.org/en/press-releases/2022/07/sustainable-development-programmes-characterised-shallow-commitment-racial) [↑](#footnote-ref-2)
3. For a discussion in relation to the public sector, see CRER (2023) [Ethnicity and Employment in Scotland's Public Sector](https://www.crer.org.uk/crer-publications) [↑](#footnote-ref-3)
4. Scottish Government (2022) [Scotland’s Labour Market: People, Places and Regions – Protected Characteristics Statistics from the Annual Population Survey 2021](https://www.gov.scot/publications/scotlands-labour-market-people-places-regions-protected-characteristics-statistics-annual-population-survey-2021/documents/) [↑](#footnote-ref-4)
5. Scottish Government (2022) [Anti-racist employment strategy - A Fairer Scotland for All](https://www.gov.scot/publications/fairer-scotland-anti-racist-employment-strategy/) [↑](#footnote-ref-5)
6. Scottish Government (2023) [Poverty and Income Inequality in Scotland 2019-22](https://data.gov.scot/poverty/) [↑](#footnote-ref-6)
7. CRER (2021) [How much of a priority are Black and minority ethnic children in tackling poverty?](https://www.crer.org.uk/blog/how-much-of-a-priority-are-black-and-minority-ethnic-children-in-tackling-poverty) [↑](#footnote-ref-7)
8. The Child Poverty (Scotland) Act 2017 commits the Scottish Government to reducing the percentage of children living in relative poverty to 10%, living in absolute poverty to 5%, living in combined low income and material deprivation to 5%, and living in persistent poverty to 5% by 2030. [↑](#footnote-ref-8)
9. United Nations: [Global indicator framework for the Sustainable Development Goals and targets of the 2030 Agenda for Sustainable Development](https://unstats.un.org/sdgs/indicators/Global%20Indicator%20Framework%20after%202023%20refinement_Eng.pdf) [↑](#footnote-ref-9)
10. For example, see information on a previous consultation process which makes no reference to ethnicity of those consulted and, aside from Gypsy/Travellers, does not mention the participation of any other minority ethnic groups or race equality organisations: Scottish Parliament (2018) [National Outcomes for Scotland Consultation: process undertaken to produce draft National Outcomes for Scotland](https://archive2021.parliament.scot/S5_Local_Gov/Inquiries/Updated_National_Outcomes.pdf) [↑](#footnote-ref-10)
11. Amongst other stages of development, a Community Ambassadors Programme was created to ensure widespread consultation with BME communities across Scotland by training community-nominated ambassadors to facilitate a consultation with their community members. [↑](#footnote-ref-11)
12. CRER (2015) Race Equality Framework for Scotland Community Ambassadors Programme - [Findings Summary](https://static1.squarespace.com/static/615c1bee105b4f55a98326d0/t/6233661b4d0d952e23a2bc63/1647535644395/Community%2BAmbassadors%2BProgramme%2BFindings.pdf) [↑](#footnote-ref-12)
13. CRER (2020) [COVID-19 and ethnicity in Scotland: Where's the data?](https://www.crer.org.uk/blog/covid-19-and-ethnicity-in-scotland-wheres-the-data) [↑](#footnote-ref-13)
14. Recommendation 11 in Expert Reference Group on COVID-19 and Ethnicity (2020) [Systemic Issues and Risk: Initial Advice and Recommendations](https://www.gov.scot/publications/expert-reference-group-on-covid-19-and-ethnicity-recommendations-to-scottish-government/) [↑](#footnote-ref-14)
15. CRER (2020) [Scotland’s National Performance Framework: Measuring outcomes for minority ethnic communities](https://static1.squarespace.com/static/615c1bee105b4f55a98326d0/t/61682e524b42ba4be073827c/1634217556637/02_Scotlands_National_Performance_Framework.pdf) [↑](#footnote-ref-15)
16. This strategy makes sparse reference to the National Performance Framework. As was highlighted in the [analysis of responses to the Equality Evidence Strategy consultation](https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2023/03/scotlands-equality-evidence-strategy-2023-2025/documents/annex-c-equality-evidence-strategy-2023-2025-analysis-responses-consultation/annex-c-equality-evidence-strategy-2023-2025-analysis-responses-consultation/govscot%3Adocument/annex-c-equality-evidence-strategy-2023-2025-analysis-responses-consultation.pdf), there is a need for closer alignment between this strategy and the National Performance Framework. [↑](#footnote-ref-16)