In relation to last week’s session with the EHRC, we welcome the opportunity to comment further, particularly in relation to clarification of the answers to the three questions we previously submitted.

1. **Helpline:**
   It was pointed out at 1070 that the new advice line advises only employees and service users – largely by producing guidance and putting information on the web. In addition at 1082 A Pringle goes on to say that they have been ‘investing quite a lot of staff time and energy in a transfer of expertise programme, which involves building up knowledge and expertise of other advice givers across the country’. It would therefore be very useful to see the ‘proper figures’ which we understand are to be submitted after the meeting in order to assess in more detail the impact of these changes (and which groups in particular may be most adversely affected). It is our experience – although only at this stage through anecdotal information gathered from a number of different organizations – that many ethnic minority individuals do not feel the current system adequately meets their needs – not least if they speak English as a second language and/or have a very limited understanding of the other advice services which they are now required to approach. Perhaps the EHRC could also be asked to clarify the work carried out to inform equality groups of the changes as well as which cuts were made to which groups (eg race equality councils) who previously offered advice services within their own sector. Without this intelligence being routinely updated (types of advice sought) we cannot hope to effectively inform policy and practice.

The EOC may wish at some point to further explore the possibility of resourcing key equality organisations to provide an advice/help line for employers and for service providers which could help fill the current void left by the EHRC.

2. **Involvement:**
   At 1088 A Pringle says they have a ‘fairly on-going arrangement with a range of third sector and equality organizations and others who help to inform and shape some of our priorities for the year’. As one of the main, and few national EM organizations in Scotland, we would like it noted that we have not been involved in any discussions about the Commission’s workplan over the last twelve months. A sister organization, the Coalition for Racial Equality and Rights has informed us that they were however in one recent discussion in relation to a report they have completed on racist bullying in schools (based on FOIs to every school in Scotland and providing very helpful recommendations). Commission staff attending the evidence session did not appear to be aware of this since A Pringle indicated that the work they intend to do on bullying in schools is based on LGBT evidence but did not mention the related work in the EM sector. More information on this research can be found at: [http://www.crer.org.uk/publications/racist-incident-reporting-in-scotland-schools](http://www.crer.org.uk/publications/racist-incident-reporting-in-scotland-s-schools)

3. **PSED:**
   We were disappointed at the focus on outcome setting only (although would urge the Committee to ask for further clarification of the criteria which the Commission intends to use to scrutinise the outcomes) with no mention of the mainstreaming or
employment monitoring reports which we believe could more ably demonstrate progress – or lack of it. It is also CEMVO’s experience that whilst the EHRC has been working with, for example, Improvement Scotland for the last couple of years (as highlighted by A Pringle at 1079) and has produced a number of guidance documents (particularly around the Public Sector Improvement Framework known as PSIF) in partnership with that organization, that very little has actually changed as a result of this. Indeed CEMVO recently was asked to present at an event attended by a number of Council staff including PSIF assessors who quite clearly expressed the view that they remain largely poorly equipped to carry out assessments in relation to equality, that the questions asked are very basic and further no national reporting whatsoever has yet been produced on improvements or change across that sector as a result of this partnership work. This is extremely worrying and should alert the Commission to the need to consider alternative approaches to inspection and scrutiny – perhaps consideration of more creative and robust approaches such as using partnerships with and/or lay assessors from the equality sectors who have more relevant expertise and insight.

Further evidence which the Committee may be interested in include the following two EHRC research reports which clearly indicate high levels of non-compliance across listed authorities yet with no follow up enforcement action. We would be very disappointed if this was the approach the Commission plans to take in May this year following publication by public bodies of equality outcomes and mainstreaming reports since this kind of scrutiny will not challenge the many examples of resistance and non compliance which unfortunately continue to exist.


As always we hope this is helpful and very much support the ongoing scrutiny and interest which the Committee is showing on equality matters in Scotland.

Eleanor McKnight
Race Equality Mainstreaming Officer
CEMVO Scotland
14 March 2013