

Communities Scotland Draft Equality Policy

Response of the Scottish Council of Jewish Communities

The Jewish Community welcomes Communities Scotland's commitment to promote and to mainstream equality and to respect diversity both within its own organisation and also in the way in which it works with communities and individuals.

The focus of the draft strategy

We share Communities Scotland's concerns about the '*equal treatment approach*' and agree that ignoring relevant differences between groups is likely to reduce rather than promote equality. For example, requiring everyone to work on Saturday would treat everyone equally but would discriminate against Jewish people.

We therefore support the view expressed in the draft strategy that '*Encouraging equal opportunities does not always mean treating people the same. It can also mean considering and reflecting difference.*' [appendix 1] We are concerned that this appears to conflict with section 4.2 of the draft policy, which commits Community Scotland to '*[following] the Scottish Executive's diversity strategies and policies*' in particular 4.2a which states that '*all staff should be treated equally irrespective of their sex, marital status, age, race, ethnic origin, sexual orientation, gender identity, disability, religion or belief, working pattern, employment status, caring responsibility, or trade union membership*'.

The term '*equality perspective approach*' [appendix 1] is unclear, and we would suggest that it should be replaced by a terms which makes the need for parity of consideration explicit. This approach, which acknowledges and respects the different needs of each community, includes the '*positive action approach*' [appendix 1] and is the appropriate course for an organisation such as Communities Scotland. In particular we welcome the recognition that policy resources and practice may have to change in order to achieve the goal of equality of opportunity and treatment for everyone.

This approach will necessarily involve discussion with individuals and communities to ascertain their particular needs so that these can be addressed. The lack of such discussion is likely to be a service levelled down to the lowest common denominator which, whilst it might not discriminate, will not fully meet the needs of any. Hospital or university chaplaincy provide a simple example: a single non-denominational chaplain is designed as a non-discriminatory resource, but since he/she cannot provide religious services except to a single faith, the effect is discriminatory; a better model is for someone other than clergy to function as a clearing house for requests for visits from clergy of all faiths.

Participation and partnership working (section 2.3)

We welcome Communities Scotland's recognition of the importance of working in partnership with different groups and organisations with an interest in equality issues. We would, however, emphasise that this should include communities themselves. We are aware of a number of instances where this has not been the case and which have resulted in inaccurate information about Judaism being presented as authoritative. We therefore urge Communities Scotland to consult regularly with communities, in particular in relation to point 10 of the **Action Plan** [appendix 3] to '*ensure ...procurement processes, policies and procedures are equality proofed*' in order to ensure accurate understanding and awareness of the practices an needs of each community. It should be accepted as a principle that all information about a particular community should be approved by that community.

Getting the right organisational culture (section 5)

We support the draft strategy's emphasis on training. We would, however, highlight the importance of using accurate and appropriate materials which have been prepared in consultation with the communities concerned, and which also present a positive view of each community.

(Unlike one example of which we are aware which asked participants to consider the experience of discrimination of 'Jews, alcoholics and criminals'.)

Improving Understanding (section 8)

We welcome Communities Scotland's commitment to ensuring that '*equalities issues....are threaded through mainstream topics*' [8.1], in particular in becoming '*more aware of religious and faith festivals*' and in incorporating this knowledge into '*routine planning and operational processes*' [8.2]

Monitoring progress (section 9)

We strongly support the need for '*maintaining records on recruitment, training and employment*' [9.2] in order to assess whether policies and practices are effective. If it is to be of value, the way in which this monitoring is carried out must, however, be such as to provide accurate and useful information. We note that Communities Scotland intends to '*carry out regular staff surveys*' [9.3] and to '*Incorporate equalities questions in regular staff surveys and act on the findings*' [**Action Plan** point 4, appendix 3].

The success of this monitoring will necessarily rely on '*Getting the right organisational culture*' [**section 5**] so that employees will feel safe in responding to the questions honestly and without restraint.

Success will also depend on getting the questions right, and we would like to highlight one area of concern, namely the choice of categories for monitoring ethnicity. In particular we would urge that categories should not mix geography, nationality, and colour (for example: White: Scottish, Irish etc; Asian: Indian, Pakistani etc; Black: African, Caribbean etc). It should also be noted that people in some communities, (for example the Jewish and Sikh communities), identify in terms of ethnicity rather than religious practice (as is recognised under the Race Relations Act), and this should be recognised when designing staff surveys. Where possible we strongly urge that staff should be encouraged to describe themselves in terms of ethnicity and religion, and be permitted multiple responses (e.g. Jewish, Irish **and** African) rather than being required to fit into one of a number of pre-determined categories.

Responsibilities (section 10)

Whilst we acknowledge that particular staff may have specific responsibilities in various areas, we welcome the statement that '*All staff have an individual responsibility for contributing to the implementation of the [equality] strategy*'. We believe that this is essential for Communities Scotland to achieve a genuinely '*supportive, open environment where all employees have the opportunity to reach their full potential*.' [5.1]

We suggest that the strategy should set out the chain of responsibility more explicitly. Whilst the Strategic Equalities Group will have a lead role [10.3], it is not clear who will have responsibility for ensuring that the strategy is being implemented effectively throughout Communities Scotland.

Summary

The Scottish Council of Jewish Communities welcomes this draft equality strategy as an indication of Communities Scotland's commitment to '*integrating equality into [their] everyday work*' [2.2]. We look forward to working in partnership with Communities Scotland to ensure that information and materials about the Jewish community is accurate, relevant and appropriate.

The Scottish Council of Jewish Communities is the representative body of all the Jewish communities in Scotland comprising Glasgow, Edinburgh, Aberdeen and Dundee as well as the more loosely linked groups of the Jewish Network of Argyll and the Highlands, and of students studying in Scottish Universities and Colleges. Members representing each of these communities have been consulted in the course of preparing this response.