

National Library of Scotland

Race Equality Scheme 2007-2010

1. Introduction

National Library of Scotland (NLS) is committed to ensuring that fairness and the promotion of equality is integral to all that we do. A new corporate Equalities Policy was introduced during 2005, covering all aspects of the Library from staff to customers. Since then, Schemes covering Disability and Gender Equality have been published, setting out our procedures for ensuring equality in these areas. This document is the Race Equality Scheme for NLS.

1.1 What is Race Equality?

'Race' is a complex notion which includes physical traits such as skin colour, but is also determined by cultural factors such as language and subjective self-identification. It is further related to nationality, birthplace and ancestral origins. Historically, an individual's perceived race has affected their life chances in many ways, overt and subtle, which have led to inequalities.

1.2 Legal Background

The Race Relations Act 1976 defines direct and indirect discrimination. It outlaws racial discrimination in employment and a range of public services. The Race Relations (Amendment) 2000 extended the provisions of the 1976 Act to cover all the functions of public authorities (with just a few exceptions).

The Race Relations Act 1976 (Statutory Duties) (Scotland) Order 2002 laid down **specific duties** on named public authorities with respect to:

- (a) employment
- (b) policy and service delivery.

A further Order laid before the Scottish Parliament in September 2006 includes a specific duty on NLS to publish a Race Equality Scheme by 30 November 2007.

The specific duties are means to the end of the **general duty to promote race equality**. This general duty has three parts:

- (a) eliminating unlawful racial discrimination
- (b) promoting equality of opportunity; and
- (c) promoting good relations between people of different racial groups.

NLS aims to meet our statutory obligations in a way that is efficient, effective and user-friendly: so we have tried to make this document as straightforward and

easy to read as possible, so that it is accessible and meaningful to all, and avoids excessive paperwork and bureaucracy.

Following CRE recommendations¹, the Scheme has been compiled using the following impact assessment procedure:

- List all NLS functions, including employment.
- Assess how relevant each function is to the general duty.
- Prioritise the most relevant functions.

Principal NLS functions are listed in our strategy document, Breaking through the walls (<http://www.nls.uk/about/policy/docs/strategy2004.pdf>, p.5). Together with the key policies which drive NLS corporate planning (p.23), this list has been used in drawing up the Race Equality Scheme. Each function has been assessed for potential impact on race equality by asking the questions:

- How relevant is each NLS function to the general duty to promote race equality?
- What information do we have about how different racial groups are affected by each relevant function?
- Could the function, or the way a policy is carried out (procedures and practices) have an adverse impact on equality of opportunity, or relations between racial groups, or could it contribute to unlawful racial discrimination?
- If the assessment suggests that any policy or the way it is carried out should be modified, what steps will NLS take to modify it?

We identify four relevant priority areas for impact assessment, to determine how each affects different racial groups and whether it promotes good race relations:

- **Employment**
- **Access**
- **Collections**
- **Procurement**

To arrive at this list, the following considerations were used:

- We can not promote race equality effectively if this principle is not built into staff management. Additionally: the promotion of race equality in employment is one of the specific duties set out in the legislation.
- We cannot promote race equality effectively if our services present avoidable barriers to their use by individuals on account of their ethnic group.
- NLS will not achieve its strategic aim of collecting contemporary Scottish published material comprehensively, including Gaelic, Scots and minority ethnic languages, if its collecting policy and practices fail to acquire material relevant to minority groups.

The remaining sections examine the three priority areas, asking the following questions about each:

- What information do we have already, and what do we currently do to promote equality?
- What further information do we need, and how will we obtain it?
- What actions will we take in each area to promote race equality?

2. Employment

2.1 What information do we have already, and what do we currently do to promote equality?

Although we have collected ethnic profile data for existing staff before, it has always been on an anonymous basis. Since this does not identify individual members of staff, it cannot be used to track their careers in NLS to monitor any correlations between ethnicity and the indicators which we are now required to measure and act upon. These are:

- Recruitment
- Training/learning and development
- Promotion
- Appraisal
- Disciplinary procedures
- Grievance procedures

Recruitment

NLS monitors the recruitment process by asking candidates to state ethnicity and disability status on job applications. This information is kept separate from other candidate application data to ensure that there is no bias in the initial selection phase of recruitment competitions. It can, however, be used to monitor for any correlations between candidate success rates by ethnic group which might alert us to the presence of inequalities, bias or discrimination.

Job advertisement process/channels

The Human Resources division of NLS is aware that the current standard publications which it uses to advertise job vacancies may not be seen equally by all potential applicants, and already uses other channels to reach a wider audience when appropriate. Advertisements have recently been placed in minority ethnic journals for some posts, and the use of Job Centres for NLS vacancies is being actively explored. Recruitment Open Days for posts for which speakers of English as a second language might be more successful than through written application are under development.

Training/learning and development

The latest NLS Progress report (June 2007) by the Investors in People programme, equality of opportunity in staff development was scored at '4' on a 5-point scale, where '5' indicates the highest possible score.

Monitoring

A staff survey in July 2007 asked staff to record their ethnic group so that this could be attached to individual staff records for monitoring. Response rates were comparable to those for earlier surveys on gender and disability (56% of staff responded to this question). However, the ethnic profile of the sample may be unrepresentative of the staff as a whole, since it was self-selecting. Caution should even be exercised about using the un-extrapolated figure of 6 respondents (1.8% of total staff) choosing the non-white categories, since the survey methodology did not prevent multiple responses from the same individual.

Following the model of the earlier monitoring work for gender, it would be desirable to determine whether these six individuals work at a range of bands which might be expected of a random sample of staff, or whether they are 'clustered' in a way that suggests a correlation between ethnic minority status and lower banding. However, the sample is not random but self-selecting, and the smallness of the numbers makes any such 'clustering' (between bands 3 and 6) of doubtful significance statistically. None the less, NLS Human Resources staff are actively looking at ways of determining whether the figures available indicate any cause for concern – at first glance, they do not.

Consultations

A consultation exercise to elicit staff opinions on NLS performance in promoting race equality was conducted in September 2007, using a questionnaire format modelled on work done for the Gender Equality Scheme in 2006 [see Appendix for preliminary results]. Such opinion data gives useful information on the third part of the general duty – whether good relations exist between people of different racial groups.

We have consulted other Scottish national collecting bodies to ensure that our employment procedures are in line with best practice. National Galleries and National Museums of Scotland, for example, are currently engaged in developing monitoring systems in connection with their own Schemes, and plan to use existing annual 'data cleansing' procedures to build staff ethnic profile information. Historic Scotland, which has been collecting and publishing staff ethnic profile data for five years, publishes figures based on response rates of 69.5% of staff of known ethnicity (<http://www.scottishexecutive.gov.uk/Topics/People/Equality/18934/legalduty>).

2.2 What further information do we need?

If we are to develop sound quantitative measures of whether vertical or horizontal segregation may exist among NLS staff across different ethnic groups, we need ethnic information about a much larger staff sample: with gender, we were able to

identify possible 'glass ceilings' of grade to investigate and rectify, because we already have gender information for all staff, which can readily be correlated with payroll information. Likewise, if there are differential advantages between ethnic groups with respect to areas such as training, grievance or disciplinary practices, we will have much more reliable evidence of this if we can monitor across the whole staff.

CEHR guidance emphasises the sensitivities of staff ethnic monitoring and the importance of gaining staff trust as to the purposes for which information is wanted. There is a notable level of scepticism expressed in the results of staff and user consultation exercises alike about the legitimacy and value of ethnic monitoring and equalities promotion. It is of the first importance that any monitoring initiatives are undertaken in a way that does not harm existing good relations between people of different racial groups.

We will continue to consult other public bodies which have had Race Equalities Schemes in place for some time to ensure best practice in how we implement the employment duty: specifically, we will explore the opportunities which the recent formation of the Scottish Executive Non-Departmental Public Bodies Equality and Diversity Skills and Information Sharing Group.

We will also examine the proposals of the recently launched CILIP Compass Project for a work-based professional development scheme for minority ethnic groups (http://www.cilip.org.uk/NR/rdonlyres/64233A22-618C-4ED4-9D3D-A68B38C31ABF/0/tribal_report1.pdf)

2.3 What actions will we take to promote race equality in employment?

We will actively encourage completion of ethnic data by new staff by building more equalities awareness training into staff induction, to gain acceptance of the need for monitoring and improve participation rates.

We will improve the quality of NLS staff ethnic information by introducing 'data cleansing' exercises which will be simple and non-bureaucratic, requiring staff to sign a copy of their basic employee details held by HR and make any corrections, amendments or deletions. Completion of ethnic data must remain voluntary, and line managers will be responsible for the return of forms; this could be built into the existing requirement for annual submission of appraisal reports.

We will publish headline figures for race equalities monitoring annually. These might appear in the NLS Annual Review, Corporate Plan or website, or in the annual report of the Equalities Group. The exact form which publication will take will be determined in consultation between Human Resources and NLS Equalities Group.

We will monitor equality in training and development opportunities by examining staff appraisal records to check for any disparities in achievement of objectives by reference to ethnic group.

Monitoring should be used to inform action and is not, of course, an end in itself, and we will urgently determine whether our partial ethnic staff profile figures indicate any segregations

3. Access

A wide range of NLS services provides access to our collections and expertise, including visitor and outreach events, exhibitions and digital services, in addition to 'conventional' access to the reading rooms by issue of readers' tickets.

3.1 What information do we have already, and what do we currently do to promote equality?

Reader profiles

Enquiries and Reference Services division maintains equalities data on new users issued with readers' tickets. User ethnic origin data trends feed into the Corporate Plan objectives on increasing reader numbers amongst under-represented groups as defined by Scottish Executive. The current figure of 11% non-white holders of new tickets [2006-7] has been largely stable since this monitoring began in 2003.

NLS takes great pride in the ethnic diversity of this user group, and in the positive feedback which it receives from many users worldwide on the quality of our services.

However, we are not complacent about this figure, and recognise that it partly reflects the more cosmopolitan complexion of the Scottish academic community, as compared to the general population (2% non-white).

External consultations

Consultations were held with the National Galleries and National Museums of Scotland in order to compare their practices on ethnic monitoring of service users: both of these commission interviewer-led audience research by questionnaire for visitors which gathers ethnic and other demographic data.

Consultation with groups of ethnic minority communities indicates a broadly favourable response to recent NLS events mounted in collaboration with, for example, Edinburgh Indian Association and Asian cultural groups.

To gauge perceptions of NLS accessibility among minority ethnic individuals as distinct from organized bodies, a webform survey has been launched to ensure that our practice in this area is informed by the views of users. [see Appendix for results].

Intensive work has been done by NLS Educational and Interpretative Services Division (EIS) to raise awareness and use of library services by non-traditional groups, in particular through events and exhibitions aimed at younger and subcontinental Asian audiences. Collaborative/partnership work, which is a library-wide strategic aim, has produced a wealth of contacts with the Edinburgh Mela, the Edinburgh Indian Association, and Asian cultural/artistic groups among many others. EIS are actively working on developing robust measures of ethnic profile of event/exhibition visitors, and it is to be hoped that these findings may be used to complement other data on library users.

EIS has also conducted focus group work on perceptions of NLS by several under-represented groups considered 'hard to reach' by the education sector, including ethnic minorities. One such exercise in connection with the John Murray Archive to gauge its potential interest to young non-white audiences showed low levels of perceived interest and relevance, and this finding has informed further outreach/liason work with groups such as Craigmyle Black Community Development Project.

A language plan for NLS is in development which will address not only issues of collecting of materials in minority languages, but also of provision of services to users who do not have English as a first language. NLS is currently exploring alternative strategies of providing some Library literature in other community languages, either online or in printed form, by employing a translating service, or by automated translation. Current unavailability of NLS leaflets in alternative languages was noted by one respondent to the online user survey.

NLS maintains a file of formal complaints made by users, and this has been examined to check for any criticisms which allege inequality of treatment. For the period from 2002 to date, there appear to be four such items. Although each of these was investigated at the time, as is standard procedure for handling complaints, these have been reviewed in preparing the RES. No evidence was found to suggest that these complaints represent an institutional problem.

3.2 What further information do we need?

Detailed 'audience research' on the general public's awareness and perceptions of NLS is conducted annually by home interview through consultants Scotinform. Although the data allows detailed analysis of the sample group (1040) by age, gender, location and socio-economic group, ethnic data have not been included to date. NLS will consider addition of an ethnic origin question in future annual surveys, since this would allow us to analyse whether there are any inequalities in public NLS awareness, perceptions or use between ethnic groups once other demographic variables have been discounted. However, there are resource implications in building an extra variable into the exercise, and the likely benefits of this step would have to be measured against cost.

3.3 What actions will we take to promote race equality in access?

Awareness training of the type which NLS has already introduced with respect to disability will be built into existing programmes of customer service training. The NLS customer charter already explicitly pledges staff to promote equality and diversity in all of our activities (<http://www.nls.uk/info/charter/>).

NLS will continue to develop links with ethnic community groups to gauge the extent of any perceived barriers to access.

NLS will consider commissioning focus group-type research to determine this question among individuals not affiliated to such groups. Previous Library report literature has stated that this type of information needs to be stronger; the cost and resource implications of commissioning and analysis mean that such work would need to be timetabled and funding identified. Qualitative data of this type has yielded useful information which might otherwise be missed owing to the difficulty of interpreting some of the quantitative data.

4. Collections

NLS acquires its material through three main channels. Under the Legal Deposit Libraries Act 2003, it is entitled by law to receive a copy of any work published in the United Kingdom, free of charge from the publisher. A Purchase Budget is allocated to buy materials which cannot be claimed under legal deposit provisions – for example, works published outwith the UK; and items are regularly donated.

4.1 What information do we have already, and what do we currently do to promote equality in collections?

Discussions have been held with Collection Development Department staff to examine whether any gaps in collecting might cause under-representation of material of interest to different ethnic groups in NLS collections.

The question of access also bears on the systems which we use to enable users to find our material. Various enhancements of the online catalogue are under development by Digital Library staff which are intended to make NLS resources more readily discoverable by users who are less familiar with traditional catalogue searching, and the inclusion of Unicode into the latest version of the Voyager system allows catalogue records to be input in a variety of non-Roman scripts.

Detailed project work undertaken in 2003-4² extended contacts with publishers and networks of producers of ethnic community information, and as a result a significant increase in acquisitions in this area was reported. At the same time,

the report noted the time-consuming nature of follow-up work to ensure comprehensive acquisition of these materials.

Deficiencies in acquisition of ethnic community-published material (in common with other non-commercial publications, such as those of amateur societies) were explicitly identified in the 2005-6 Departmental Plan, and the objective of increasing acquisitions in this area set out.

Legal Deposit: A new Legal Deposit Claims Database introduced in 2005 remedies known deficiencies in claiming material directly from publishers, and is noted to have improved the efficiency of tracking publishers and their output. In principle, it enables the tagging of ethnic publications, and this could be used to quantify any trends, positive or negative, in our acquisitions in this area.

Purchase: the Purchase Fund was increased from £1.058m to £1.3m in 2006. This has enabled more extensive buying of South Asian materials, and work is under way to build the purchase of 'New Scots' East European language and community materials into the integrated Collection Development Policy. NLS holdings of South Asian materials have been promoted with publicity leaflets to raise awareness. Digitisation of medical volumes from NLS' India Papers collection has been made possible by securing a substantial grant from the Wellcome Trust. Among the explicit objectives of this project is to widen access to materials of potential interest to ethnic communities in Scotland.

Donations: donations of all material types which cannot be claimed by legal deposit are routinely solicited: Of particular note in the last area is the Window to China programme administered by the Chinese State Council Information Office and the National Library of China, under which some 117 volumes have recently been donated.

Regular consultations with the Ethnic Library Service of Edinburgh City Council by Collection Development staff have increased NLS contacts with ethnic information networks, and comparisons of our holdings with theirs have helped identify materials for acquisition.

4.2 What further information do we need?

It would be useful to have a quantitative measure of NLS' 'success rate' in acquiring ethnic materials. NLS should investigate the feasibility and resource implications of identifying and tagging such materials, with a view to monitoring any trends.

It is noted that some material acquired by public library ethnic services and commercially distributed on a large scale in Scotland is published abroad and therefore cannot be claimed under legal deposit provisions. Purchase of a number of East European serial titles, for example, has recently commenced, and the formation of guiding principles for purchase in the forthcoming integrated collection development policy should make clear how these are selected.

4.3 What actions will we take to promote race equality in collections?

NLS will endeavour to develop benchmark information on our collection of minority ethnic information by comparison with the British Library and/or National Library of Wales. This type of exercise has previously been used to good effect in identifying gaps in our acquisition of monographs collected by the BL.

Equality of opportunity principles will inform the emerging integrated collection development policy. This will guide the allocation of NLS resources to identifying, acquiring and making accessible (cataloguing) materials of particular interest to ethnic minorities in Scotland.

5. Procurement

Scottish Government guidance on procurement makes it clear that this key activity of public bodies must be carried on in a way which systematically ensures that equality of opportunity prevails across all potential suppliers of goods and services to the public sector.

5.1 What information do we have already, and what do we currently do to promote equality in procurement?

Procurement of goods and services deemed to be core to Library activities by NLS Estates Division is carried out according to a formal planning procedure issued by CRE³. Construction suppliers are checked by membership of Constructionline, inclusion in which verifies that they meet equal opportunities standards.

5.2 What further information do we need?

However, much procurement activity is carried out by other budget-controlling units of NLS is not subject to this type of formal process.

A Library-wide procurement policy is under development to extend the principles which ensure there are no barriers to particular suppliers securing tenders for NLS contract work throughout the Library.

5.3 What actions will we take to promote race equality in procurement?

We will review the progress of development of a NLS-wide procurement policy at the end of the first year of this Scheme.

Action Plan

What will we do?	Who?	By when?
Begin development of strategy for measuring, analyzing and publishing employment indicators	HR	July 2008
Introduce equalities awareness training into staff induction	HR	July 2008
Research and introduce regular 'data cleansing' exercise to improve ethnic monitoring data	HR	April 2008
Publish staff monitoring figures annually	HR/Strategy and Communications	November 2008
Research addition of ethnic data to Omnibus survey	Strategy and Communications	June 2008
Further development of outreach work/ consultations with ethnic community groups and users	Strategy and Communications/ Customer Services	November 2008
Feasibility study for qualitative user opinion research	Strategy and Communications/EIS	April 2008
Incorporation of Equalities statement into integrated collection development policy	Collection Development Department	April 2008
Review development of Library-wide procurement policy	Corporate Services	November 2008

Appendix 1: Findings and observations from a survey of staff opinion regarding the promotion of race equality in NLS

In September/October 2007, a survey distributed via NLS' intranet asked all staff to complete an online questionnaire.

This questionnaire asked a series of four questions about respondents' opinion on equality of staff treatment in a number of areas: recruitment/selection, promotion, training and development, and appraisal. Staff were invited to state which ethnic group they belonged to, and make any comments to amplify their answers.

Exactly 100 staff responded to the questionnaire.

To the question 'In your experience/opinion, are staff from different ethnic backgrounds treated equally regarding recruitment/selection?', 90 staff replied 'Yes', 6 replied 'No', and four did not indicate yes or no. Of these four, all commented that they had insufficient evidence to form an opinion; some commented that the omission of a 'Don't know' option in the questionnaire was a failing. This comment seems justified.

Responses: staff opinion survey	Yes	No	Don't know/not completed
Q1. Are staff from different ethnic backgrounds treated equally: regarding <i>recruitment/selection?</i>	90	6	4
Q2. " " <i>regarding promotion?</i>	94	1	5
Q3. " " <i>regarding training/development?</i>	93	3	4
Q4. " " <i>regarding flexible working arrangements?</i>	94	1	5
Q5. " " <i>regarding appraisal?</i>	94	2	4

Of the hundred respondents, three chose ethnic groups outside the 'White' categories. Three raised criticisms of the categories themselves (these are a standard Census list, as recommended in CRE guidelines), mentioning: the apparent conflation of nationality with race; objections to English respondents having to classify themselves negatively as 'White – other British'; and objections to the practice of classifying individuals generally.

Eight respondents criticised the omission of an explicit 'Don't know' option in only offering 'yes/no' checkboxes for question answers. Again, this is a legitimate point: when 'Don't know' was added as a response option in the public webform questionnaire, the numbers choosing not to answer yes or no were significantly higher.

Of the 6 'No' answers to question 1 (the highest proportion of 'unfavourable' responses indicating an opinion that equality does not obtain within NLS), only one was from a member of staff who indicated they were from a non-white group. Of the remaining 5, three stated their opinion that 'positive discrimination' or 'preferential treatment' was sometimes given to 'non-Europeans' or candidates whose spoken or written English is not of a high enough standard for job requirements.

One respondent stated a belief that staff from ethnic minority backgrounds are sometimes left out of training programmes owing to special difficulties of language/understanding.

Summary

These observations are only indicative, and the questionnaire's wording and administration had serious limitations – not least that, although the availability of printed copies was advertised, no requests were received, and consequently no staff who do not routinely use e-mail can be expected to have participated.

Probably the most salient feature of the responses was the minority but clearly expressed scepticism about initiatives to promote equality, and the belief in the existence of 'reverse discrimination' in NLS. Positive discrimination is not practised in NLS, and any future initiatives will have to make clear that equality is the objective, in order to avoid damaging the good race relations which currently exist and which are a vital element of our general duty to promote equality.

Appendix 2: Findings and observations from a survey of user opinion regarding the promotion of race equality in NLS

In September/October 2007, a survey questionnaire was advertised on NLS website and in Discover NLS magazine under the headline 'Have your say: race equality survey'. The website advertisement carried a link to a brief online questionnaire.

The questionnaire asked the respondent's ethnic background, followed by four questions to be answered by ticking 'Yes', 'No', or 'Don't know', followed by space for comments.

- Do you think NLS treats users from different ethnic backgrounds equally?
- Do any of our policies or practices have a negative impact on people from some ethnic backgrounds?
- In your dealings with the Library have you ever have you ever been treated unfairly or made to feel uncomfortable because of your ethnic background?
- Do you think we do a good job of promoting race equality in the National Library of Scotland?

Any combination of questions could be answered or omitted.

By 9 October, 20 completed forms had been received, as follows:

	Yes	No	Don't know
Q1. Do you think NLS treats users from different ethnic backgrounds equally?	11	1	7
Q2. Do any of our policies or practices have a negative impact on people from some ethnic backgrounds?	2	11	5
Q3. Do you think we do a good job of promoting race equality in the National Library of Scotland?	7	2	7
Q4. In your dealings with the Library have you ever been treated unfairly or made to feel uncomfortable because of your ethnic background? [space for examples]	2	15	0

As with the staff survey, the numbers are too small to make hard quantitative analysis sensible. The sample is again self-selecting and not randomised to be representative, but a few tentative observations can be offered.

Interestingly, the two respondents who answered 'Yes' to Q4. (the question about having been treated unfairly because of their ethnic background), both also answered 'Yes' to the question, Do you think NLS treats users from different

ethnic backgrounds equally? One gave his/her ethnic group as 'White – Scottish'. This emphasises the risk of damaging good race relations in our attempts to promote equality.

Of the few comments submitted, the only one which gave an example of an NLS policy or practice which has a negative impact on people from some ethnic backgrounds cited the unavailability of Library leaflets in alternative languages.

¹ The duty to promote race equality in Scotland : the statutory code of practice and non-statutory guides for local authorities. Commission for Racial Equality in Scotland. (Edinburgh, 2002).

² Ethnic community publications: legal deposit collection development. Report of a joint chartership and legal deposit unit project. JOHNSTONE, Gavin & GILES, Jennifer. (Edinburgh: National Library of Scotland [internal report], 2004).

³ Race equality and procurement in local government: a guide for authorities and contractors. (London: Commission for Racial Equality, 2003)