

# Equality Impact Assessment: initial screening

## What is being assessed by whom?

<b>Name of the policy<sup>1</sup></b>
Social Media - specifically our Facebook, twitter, blog, enewsletter and YouTube outputs.
<b>Name of person leading the assessment<sup>2</sup></b>
Jim Jeffrey
<b>Names of other team members</b>
Joan Robertson (SEPA)
Is this a new or existing policy? New <input checked="" type="checkbox"/> Existing being reviewed <input type="checkbox"/>  If existing, then please check to see whether a previous EqIA is available to provide a basis for this assessment.

## Initial screening

	Yes	No
Does the policy impact on people? (e.g. on service users, businesses, employees, wider community)	X	<input type="checkbox"/>
Will it have a significant effect on how other organisations operate?	<input type="checkbox"/>	X
Does it relate to an area where SNH has set <a href="#">equality outcomes<sup>3</sup></a> ?	X	<input type="checkbox"/>
Does it relate to an area where there are known inequalities?	X	<input type="checkbox"/>

*If you answered **Yes** to any of the above, please proceed to Stage 1 of the EqIA form.*

<sup>1</sup> The term policy is shorthand for policies, provisions, criteria, functions, practices and activities including the delivery of services.

<sup>2</sup> Person leading on the policy development

<sup>3</sup> Through the delivery of our services people who are under-represented as a result of a protected characteristic are more able to visit and experience the outdoors

Our workforce broadly reflects the diversity of the population of Scotland

Our workforce welcomes, values and promotes diversity

The gender pay gap is reduced

If you answered **No** to all of these, you do not need to carry out an EqIA so proceed to sign and complete the statement below.

An EqIA is not needed  Date:

Signed	Date
Lead officer:	
Responsible officer <sup>4</sup> :	

Please now publish the initial screening section of the form in eRDMS file [B239231](#) and email confirmation to [diversity@snh.gov.uk](mailto:diversity@snh.gov.uk). Please also retain a copy with your policy documents.

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<sup>4</sup> Person with overall responsibility for the policy.

## Equality Impact Assessment: assessing impact

### Stage 1. The purpose of the policy, service, activity etc.

<p>What is the purpose of the policy?</p>	<p>The purpose of our social media work is to broaden awareness of Scotland's Natural Heritage and to make it more accessible to those who live in and visit Scotland.</p>
<p>Who does the policy affect? (employees, customers, equality groups, stakeholders)</p>	<p>This policy affects customers, equality groups and stakeholders. This policy affects some employees, dependent upon their role in the organisation (it has a positive impact on staff members in that it makes their role in the organisation more readily seen and understood).</p>
<p>What results/outcomes are intended?</p>	<p>Social media enables us to widen the reach and understanding of the work of Scottish Natural Heritage and appreciation of Scotland's nature and landscapes, in particular younger people make use of social media as opposed to picking up an SNH publication. It also encourages interaction and discussion about our natural heritage. The design and style we use are intended to take account of those people with learning disabilities, with limited English and literacy skills to understand and appreciate our role and function.</p>

## Stage 2. Relevance to the needs of the general equality duty

Please consider which aspects of the policy are relevant to the three needs of the general equality duty

	Comment
Eliminate unlawful discrimination	Yes, by use of social media we are reaching a younger audience. In addition people with a disability and those who don't have English as a first language are supported by the use of a structure and style that can be easily understood. The methods we use and the style we use are compatible with adaptive technology.
Advance equality of opportunity	Our social media outputs allow greater access to our work and sites for the growing number of people who access information through social media. This includes young people, an increasing number of older people and those who have a disability which prevents them from actively enjoying Scotland's natural heritage.
Foster good relations between groups of people	By using twitter and Facebook we allow dialogue between different individuals from across the spectrum including older and younger people, people from different ethnic groups and those with disabilities.

## Stage 3. To which of the equality groups is this policy relevant?

All	<input type="checkbox"/>	Sexual orientation	<input type="checkbox"/>
Age	<input checked="" type="checkbox"/>	Gender reassignment	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Pregnancy and maternity	<input type="checkbox"/>
Gender	<input checked="" type="checkbox"/>	Religion and belief	<input type="checkbox"/>
Race	<input checked="" type="checkbox"/>		

**If you decide that the assessment is not relevant to some groups, please say why below.**

Whilst our social media work has a positive impact on those groups identified above it is not influenced by and does not influence

the remaining groups.

## Stage 4. Evidence

Please consider what evidence is available to help you identify the impact the policy may have on people amongst the relevant groups you have identified? Both quantitative (statistics etc.) and qualitative (event feedback etc.) are equally valid. Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, [Scottish Government Evidence Finder](#), the views of equality groups, as well your own experience of working in this area etc.

Remember to consider whether this requires you to consult relevant equality groups. Where it is not possible to gather new information in time to inform the assessment, consider including such actions in your plans to monitor and review the policy.

Protected characteristic	Evidence	Source	Gaps and actions taken
Age	<p>The Registrar General's Annual Review of Demographic Trends indicates that Scotland is an ageing population with the over-65s increasing 59% by 2035.</p> <p>A recent OFCOM report (covering the UK population) indicated over eight in ten (83%) of adults now go online using any type of device in any location. Nearly all 16-24s and 25-34s are now online (98%), and there has been a nine percentage point increase in those aged 65+ ever going online (42% vs. 33% in 2012).</p>	<p><a href="#">Scottish Government Evidence Finder</a> (Scotland's Population 2013 (Published in The Registrar General's Annual Review of Demographic Trends))</p> <p><a href="#">OFCOM Adults' Media Use and Attitudes Report 2014</a></p> <p><a href="#">Internet Access – Households and Individuals – ONS</a></p>	<p>SNH currently do not monitor the age groups of social media users and assumptions of the audience being broadly reflective of the population have been made.</p>

[Statistical Bulletin - 2014](#)

Two-thirds (66%) of online adults say they have a current social networking site profile, unchanged since 2012 (64%). Nearly all with a current profile (96%) have one on Facebook, although the incidence of having only a Facebook profile has fallen to 43% in 2013 compared to 53% in 2012. Three in ten social networkers say they have a Twitter profile, and one in five say they have a YouTube (22%) or WhatsApp profile (20%). Social networking overall remains a popular pastime, with 60% of users visiting sites more than once a day, an increase from 50% in 2012, and with 83% of 16-24s doing so (69% in 2012) (OFCOM report). Almost all adults aged 16 to 24 (91%) used social networks in 2014, but also around 37% of adults aged 55 to 64 and 13% of those aged 65 and over participated in social networking in 2014. (ONS Statistical Bulletin).

Compared to 2012, there are fewer non-users of the internet now, with 12% saying that they don't have access to the internet at home and don't intend to get the internet at

	home in the next 12 months. In 2012 the proportion was 15%.		
Disability	<p>The 2011 Scottish census indicates that 19% of adults in Scotland have a long-term illness, or disability. Use of social media is successful in allowing 'virtual' access to information on Scotland's species and landscapes via our digital and social media outputs.</p> <p>However, barriers to accessing different social media channels remain but are improving.</p>	<p><a href="#">Scottish Government Evidence Finder</a></p> <p><a href="#">Social Media for People with a disability – Media Access Australia</a></p>	
Gender	<p>2011 census data shows that 51.5% of the Scottish population are female.</p> <p>There is no significant difference in the proportion of male and female access to social media, although use does vary slightly.</p> <p>Females with a current social networking profile are slightly more likely than males to use Facebook (98% vs. 94%). However, males are significantly more likely than females to use Twitter (34% vs. 24%) and YouTube (28% vs. 16%).</p>	<p><a href="#">Scottish Census 2011</a></p> <p><a href="#">OFCOM Adults' Media Use and Attitudes Report 2014</a></p>	<p>Our Facebook statistics shows that our likes are split 60% female 38% male, which is in contrast to the general trend on Facebook of 46/54.</p>

Gender reassignment			We do not hold information on gender reassignment amongst our social media users.
Marriage and civil partnership			We do not hold information on marital status of our social media users.
Pregnancy and maternity			We do not hold information on pregnancy/maternity amongst our social media users.
Race	<p>The Scottish Census of 2011 shows that 4% of people are from visible minority ethnic groups. 96% of the population are recorded as white ethnic of whom 4% are classed non-British white. Polish make up 1.2% of the latter.</p> <p>93% of people 3 years and over report that they used only English at home. 98% of the population 3 years and over reported that they could speak, read, write or understand English. Only 1.2% of people 3 years and over reported being unable to speak English well and just 0.2% were unable to speak English at all.</p>	<a href="#">2011 Census: Key Results on Population, Ethnicity, Identity, Language, Religion, Health, Housing and Accommodation in Scotland - Release 2A</a>	We do not hold ethnicity data for our media service users. However, by using Plain English techniques and wide use of images we make our social media channels as accessible as possible to those with limited English language skills or who do not note English as their first language.
Religion or belief			We do not hold information on religion/belief amongst our social media users.

Sexual orientation			We do not hold information on sexual orientation amongst our social media users.
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Additional comments:

Please Include here any further general comments as supporting evidence, for example, derived from consultation with equality groups and/or stakeholders etc.

## Stage 5. The significance of the potential impacts

Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the policy offers opportunities to promote equality and/or foster good relations.

Protected characteristic	Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
Age	Positive: Our social media work makes information about our natural heritage more accessible to a wider audience. Our YouTube and Facebook channels allow an audience that may be unable to experience nature in the outdoors access to a wide range of materials from their own home or community.	+	M
Disability	Positive: The range of readers and assistive devices associated with online activity ensure that SNH's social media outputs are widely available. By converting our magazine into audio files we further increase the range of materials available informing audiences about the role of SNH and our work to raise awareness and enjoyment of Scotland's Natural Heritage	+	H
Gender	Neutral: There is no evidence to suggest that access to social media differs significantly between male and females, although use of different social media channels does vary by gender. The fact we utilise a range of social media channels in our communication suggests that the differential impact overall remains fairly neutral.	0	L
Gender reassignment	Neutral		

Marriage and civil partnership	Neutral		
Pregnancy and maternity	Neutral		
Race	The use of Plain English in our written communications (both online and in print) as well as strong use of imagery addresses many of the needs of those whose first language is not English. We are able, on request, to explore the possibility of translating key elements of our published work. Our social media policy makes a significant contribution to raising awareness of both SNH and Scotland's natural heritage.	+	H
Religion or belief	Neutral		
Sexual orientation	Neutral		

**Use the following guidance to inform your responses:**

Indicate:

- Where you think that the policy could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the policy could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this policy has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a policy may be highly relevant to one aspect of equality and not relevant to another.

<b>High impact</b> (The policy or process is very equality relevant)	There is significant potential for or evidence of adverse impact The policy is institution wide or public facing The policy has consequences for or affects significant numbers of people The policy has the potential to make a significant contribution to promoting
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	equality
<b>Medium impact</b> (The policy or process is somewhat equality relevant)	<p>There is some evidence to suggest potential for or evidence of adverse impact</p> <p>The policy is institution wide or cross-Unit, but mainly internal</p> <p>The policy has consequences for or affects some people</p> <p>The policy has the potential to make a contribution to promoting equality</p>
<b>Low impact</b> (The policy or process might be equality relevant)	<p>There is little evidence to suggest that the policy could result in adverse impact</p> <p>The policy operates mainly within a Unit</p> <p>The policy has consequences for or affects few people</p> <p>The policy may have the potential to contribute to promoting equality</p>

## Stage 6. Action needed to fulfil the needs of the general equality duty

Please consider the results of your impact assessment, what mitigating or positive action do you recommend in order to fulfil the three needs of the general equality duty? This will involve considering whether the evidence indicates that there is likely to be a differential impact<sup>5</sup> on particular equality groups, and particularly whether this impact is disproportionately negative. Remember that it is lawful under the Equality Act to treat people differently in some circumstances, for example taking positive action or putting in place single-sex provision where there is a need for it. It is both lawful and a requirement of the general equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary.

Needs of the general equality duty	Mitigating or positive actions needed, recommended or planned for each protected characteristic. (Age, Disability, Gender, Race, Sexual orientation, Gender reassignment, Pregnancy and maternity, Religion or belief)
1. Eliminate unlawful discrimination, victimisation or harassment	We will continue to promote our various social media channels in order to increase the reach of our messages and ensure that as wide an audience as possible has an opportunity to engage with and enjoy Scotland's natural heritage.
2. Advancing equality of opportunity	It is our intention to explore the possibility of working with regional equality groups through the Scottish Alliance of Regional Equality Councils (SAREC) and its members, to increase our reach to ethnic minority audiences, and minimise any possible inequalities in our reach. We will also work through RNIB and Scottish Accessible Information Forum (SAIF) to ensure that our digital and social media outputs are compliant and sympathetic to recent technological developments and best practice
3. Fostering good relations	By liaising with specialist groups and agencies (such as RNIB) we would hope to further extend the reach of our information.

<sup>5</sup> Suggests that a particular group has been affected differently by a policy, in either a positive, neutral or negative way.

## Stage 7. Taking account of the results of the assessment

Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:

- **No major change** – your assessment demonstrates that the policy is robust. There is no potential for unlawful discrimination and you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review
- **Adjust the policy** – this involves taking steps to remove any barriers, to better advance equality or to foster good relations.
- **Continue the policy** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the policy** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the policy altogether. If a policy leads to unlawful discrimination it should be removed or changed.

Option selected	Justification
No major change	We have not identified any unlawful discrimination and have identified a number of positive impacts that our social media policy delivers.

## Stage 8. Summary of agreed actions resulting from your assessment

What action, by whom, will be undertaken as a result of the impact assessment.

No.	Action	Person responsible	Timescale
1.	Survey monkey use to establish who our social media audience are and identify any gaps in coverage	Jim Jeffrey	12 months.
2.	Contact Scottish Alliance of Regional Equality Groups and its members.	Jim Jeffrey	12 months
3.	Contact RNIB and	Jim Jeffrey	12 months.

	Scottish Accessible Information Forum (SAIF) to ensure that our digital and social media outputs are compliant and sympathetic to recent technological developments and best practice		
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## **Stage 9. Monitoring implementation**

We will continue to gather statistics relating to our social media outputs. This information will help to inform us about our audience and identify any areas where we perceive ourselves to have a weak reach. Our statistics will be monitored at a yearly interval specifically to ensure that our equality goals are being met by our social media outputs. We engage stakeholders in this process through use of surveys, direct contact with special interest groups and by using our social media channels themselves to review our progress.

**Review date: 17 March 2017.**

## **Stage 10. Procurement**

The public sector equality duty for procurement requires bodies to consider how they can further fulfil the needs of the general duty in how they procure goods and services both through the award criteria and contract conditions. This applies to thresholds which most, if not all, our procurement falls below. However, EHRC guidance encourages public bodies to adopt these principles to help meet our broader obligations in relation to procurement and equality.

Consequently, if your proposal involves any related procurement of goods, services or advice, you should now consider how best to reflect the results of your impact assessment in the procurement process.

Award criteria at tender stage	N/A
How will you evaluate award criteria	N/A
Contract performance criteria	N/A

## Stage 11. Authorisation

Please confirm that:

This Equality Impact Assessment has informed the development of this policy:

Yes  No

Opportunities to promote equality in respect of age, disability, sex, pregnancy and maternity, gender reassignment, sexual orientation, race and religion or belief have been considered, i.e.:

- Eliminating unlawful discrimination, harassment, victimisation;
- Advancing equality of opportunity;
- Fostering good relations

Yes  No

I am satisfied with the equality impact assessment that has been undertaken for Social Media Policy and give my authorisation for the results of this assessment to be published on the SNH website.

<b>Name:</b>	<b>Alison Bell</b>
<b>Position:</b>	<b>Unit Manager/Principal Adviser</b>
<b>Authorisation date:</b>	<b>19 March 2015</b>

Note: if this EqIA is associated with a policy that requires Director, Management Team or Board sign-off, you should arrange for the results of the assessment to accompany approval of the policy. This is to ensure that decision-makers are given sufficient information to enable them to pay due regard to equality when making their decision.

## Stage 12. Storing and publishing this EqIA

The regulations require that where an assessment has been made and the policy is implemented, the results of any assessment be published 'within a reasonable period' of the decision to apply the policy.

Please now publish this EqIA in eRDMS file [B239231](#) and send the ID to the Equality and Diversity Team [diversity@snh.gov.uk](mailto:diversity@snh.gov.uk) for quality assurance and publishing on the SNH website.