

Equality Impact Assessment: initial screening

What is being assessed by whom?

Name of the policy¹
Communication Strategy – implementation.
Name of person leading the assessment²
Jim Jeffrey
Names of other team members
Alison Bell, Rob Threadgould, Daniel Gotts, Rachel Hellings
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 EqlA 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?	X	<input type="checkbox"/>
Does it relate to an area where SNH has set equality outcomes ³ ?	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 EqlA form.*

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

² Person leading on the policy development

³ 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 ⁴ :	

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

⁴ Person with overall responsibility for the policy.

Equality Impact Assessment: assessing impact

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

What is the purpose of the policy?	The purpose of our Communication Strategy is to set out the basic principles and aims for SNH's communication activities and processes.
Who does the policy affect? (employees, customers, equality groups, stakeholders)	This policy affects all of our stakeholders and staff. It aims to ensure that all of our communication activities are both accessible and inclusive.
What results/outcomes are intended?	Our communication is fundamental to ensuring that all audiences (regardless of age, disability, gender, race, religious belief or sexual orientation) are able to appreciate our role, access our information and absorb messages which are clear, user-friendly for a range of audiences, and maximise equality opportunities. Communication activity is a common responsibility across the organisation.

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 using a range of communications tools (e.g. website, social media, events, publications, projects) and adopting a structure and style of delivery which can be easily understood.
Advance equality of opportunity	Our Communication Strategy facilitates access to the work of SNH. Our website is undergoing a refresh, and equality implications have been built into the development of the new build. By investing significant resources in online publishing we likewise extend the reach of our messages and ensure that those remote from a particular subject or location are nevertheless better able to participate and engage with our communications outputs. Where we produce materials for events these are designed and produced in accordance with our brand guidelines, a cornerstone of which is ensuring materials are clear, well written and corporately branded.
Foster good relations between groups of people	-----

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 communication strategy will have 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>Scottish Government Evidence Finder (Scotland's Population 2013 (Published in The Registrar General's Annual Review of Demographic Trends)</p> <p>OFCOM Adults’ Media Use and Attitudes Report 2014</p> <p>Internet Access – Households and Individuals – ONS</p>	<p>SNH makes an assumption that our audience broadly reflects the population of Scotland as a whole. The census reveals a significant proportion of Scotland’s population to be over 65, and further evidence reveals that this age group is increasingly active online. By investing in online delivery for several aspects of our Communication Strategy we are able to reach a wider audience than if our outputs were conventional print and events-based only. Moreover, traditional communications tools may not fully engage young people.</p>

	<ul style="list-style-type: none"> In quarter 1 (Jan to Mar) 2015, 86% of adults (44.7 million) in the UK had used the internet in the last 3 months (recent users), (ONS Statistical Bulletin 2015). 	Statistical Bulletin - 2014	
Disability	<p>The 2011 Scottish census indicates that 19% of adults in Scotland have a long-term illness, or disability. Use of tools such as our website in our Communications outputs is important in facilitating ‘virtual’ access to information.</p> <p>Nevertheless, barriers to accessing online resources remain (broadband connection variance) but are acknowledged.</p>	Scottish Government Evidence Finder Scotland’s Future – Connecting Rural Scotland, A Scottish Government report	Conventional communications activities can prove exclusive for some groups. Both our website and our social media channels benefit from the existence of and use of assistive technologies, and we are aspiring to make our new website as W3C (World Wide Web Consortium) Standards Compliant as reasonably possible.
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 reach which we anticipate in our Communications work.</p>	Scottish Census 2011 SNH Customer Survey – The Scottish Public The SNH Scottish Nature Omnibus	Our Scotland’s Nature Omnibus survey did not detect any significant difference in awareness of SNH or our outputs based on gender. Nevertheless, there is evidence that some groups, including women, experienced feelings of vulnerability in the outdoors. By making our communications delivery clearly gender non-specific we will

		Autumn 2014 Equalities and Human Rights Commission – SportsScotland report	encourage increased participation by all disadvantaged or 'harder to reach' groups.
Gender reassignment			We do not hold information on gender reassignment in regard to our communications delivery
Marriage and civil partnership			We do not hold information in relation to Marital or civil partnership status in regard to our communications delivery
Pregnancy and maternity			We do not hold information on pregnancy/maternity in regard to our communications delivery
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. 1.2% of the latter recorded their ethnic group as white Polish.</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</p>	2011 Census: Key Results on Population, Ethnicity, Identity, Language, Religion, Health, Housing and Accommodation in Scotland - Release 2A	We do not hold ethnicity data regarding the reach of our communications delivery, however our Scotland's Nature Omnibus survey reveals that minority ethnic groups consistently show low levels of awareness and involvement with nature Therefore, by using plain English and using an inclusive range of images that acknowledges the ethnic diversity in Scotland, we intend to make our communication as accessible and relevant as possible to those with limited English language skills or who do not note English as their first language. Our Communication Strategy also acknowledges our

	well and just 0.2% were unable to speak English at all.		commitment to the Gaelic Language Act and many of our outputs therefore contain a Gaelic element.
Religion or belief			We do not hold information on religion/belief amongst our audiences.
Sexual orientation			We do not hold information on sexual orientation amongst our audiences.

<p>Additional comments:</p> <p>It is our intention to contact the Outdoor Recreation Network (ORN), formerly the Countryside Recreation Network (CRN) to discuss perceived barriers to recreation in the countryside - from urban greenspace in towns and cities to remote, countryside and wilderness spaces – to see if any elements of our Communication Strategy could better encourage outdoor access.</p>

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 most recent Scotland's Nature Omnibus survey revealed that there is a need for SNH to ensure effective usage of the wide range of electronic communication channels available. Both our website and our social media work makes information about our natural heritage more accessible to a wider audience. In compiling our EqlA for our Communication Strategy work we have made use of census information and populations trends, along with other available demographic statistics. The principles of equality and diversity work are embedded into our current Communication Strategy work and future plans.	+	M
Disability	Positive: our electronic communication benefits from the existence of and use of assistive technologies; we intend to make our new website as W3C Standards Compliant as reasonably possible.	+	H
Gender	Neutral: There is no evidence to suggest that access to our communication materials differs significantly between male and female audiences. There is evidence to suggest that the female audience is less likely to engage with Scotland's natural heritage than male; our communication strategy is encouraging	0	L

	and inclusive of both genders.		
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 showing diversity addresses some of the needs of those whose first language is not English. This approach is intended to be inclusive. We are able, on request, to explore the possibility of translating key elements of our published work.	+	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.

High impact	There is significant potential for or evidence of adverse impact
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<p>(The policy or process is very equality relevant)</p>	<p>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 equality</p>
<p>Medium impact (The policy or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The policy is institution wide or cross-Unit, but mainly internal The policy has consequences for or affects some people The policy has the potential to make a contribution to promoting equality</p>
<p>Low impact (The policy or process might be equality relevant)</p>	<p>There is little evidence to suggest that the policy could result in adverse impact The policy operates mainly within a Unit The policy has consequences for or affects few people 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 impact⁵ 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 monitor our Complaints Policy for evidence of any issues related to equality matters. We will proactively continue to use electronic channels to extend the reach of our Communication Strategy, and thus help ensure that as wide an audience as possible has an opportunity to engage with our communication activities 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 published 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.

⁵ 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 Communication Strategy and associated outputs deliver.

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.	Contact Scottish Alliance of Regional Equality Groups and its members.	Jim Jeffrey	12 months
2.	Contact RNIB and Scottish Accessible Information Forum (SAIF) to ensure that our digital outputs are compliant and sympathetic to recent	Jim Jeffrey	12 months.

	technological developments and best practice		
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Stage 9. Monitoring implementation

We will continue to gather statistics relating to our communication. This information will help to inform us about our audience and identify any areas where we perceive ourselves to have a weak reach. We will engage stakeholders in this process through use of surveys, direct contact with special interest groups and by using our published reports and digital analytics to review our progress.

Review date: 17 March 2017.

Reviewer: Jim Jeffrey

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 Communications Strategy work and give my authorisation for the results of this assessment to be published on the SNH website.

Name:	Alison Bell
Position:	Unit Manager/Principal Adviser for Communications
Authorisation date:	7 January 2016

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 for quality assurance and publishing on the SNH website.