

# Equality Impact Assessment: initial screening

Please complete the form using the blank rows, as well as the greyed out boxes containing guidance that you should overwrite.

## What is being assessed by whom?

<b>Name of the policy<sup>1</sup></b>
SNH Corporate Website
<b>Name of person leading the assessment<sup>2</sup></b>
Pam Malcolm
<b>Names of other team members</b>
Suzanne Kilbane
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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Will it have a significant effect on how other organisations operate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does it relate to an area where SNH has set equality outcomes <sup>3</sup> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does it relate to an area where there are known inequalities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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.

<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

An EqIA is not needed  Date:

Signed	Date
Lead officer: Pam Malcolm	21 Sep 2015
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>Please describe in this paragraph the purpose of your policy</p> <p>The purpose of our website is to provide information and advice about Scotland’s natural heritage. The main objective of the project to create a new website presence for SNH by reviewing our existing SNH corporate website and satellite sites and create a new website with a higher standard of content and functionality, which is more appropriate for our audiences based on user evidence.</p>												
<p>Who does the policy affect?        (employees, customers, equality groups, stakeholders)</p>	<p>Please describe who the policy might affect and how, and who might benefit from the policy and in what ways</p> <p>The policy affects members of all of our audience groups:</p> <table border="1" data-bbox="875 1098 1915 1340"> <thead> <tr> <th>Public Audiences/Visitors</th> <th>Government &amp; Policy</th> <th>Commercial</th> </tr> </thead> <tbody> <tr> <td>Scottish residents</td> <td>ScotGov. Departments &amp; Directorates</td> <td>Developers</td> </tr> <tr> <td>Scottish communities</td> <td>ScotGov. Agencies &amp; Non-Dept Bodies</td> <td>Commercial Consultants</td> </tr> <tr> <td>Sporting &amp; recreational users</td> <td>Government working groups (CPG, SEARS, etc.)</td> <td>Agri-Producers</td> </tr> </tbody> </table>	Public Audiences/Visitors	Government & Policy	Commercial	Scottish residents	ScotGov. Departments & Directorates	Developers	Scottish communities	ScotGov. Agencies & Non-Dept Bodies	Commercial Consultants	Sporting & recreational users	Government working groups (CPG, SEARS, etc.)	Agri-Producers
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What results/outcomes are	Please summarise what you aim to achieve with the policy/service/function. Focus on the changes people will experience or the outputs they are likely to see as a result of its																								

intended?	<p>implementation.</p> <p>The website allows us to raise awareness of Scotland's nature and landscapes.</p> <p>An improved higher standard of website which meets W3C standards will enable more people to access to our information.</p> <p>The design and style is intended to improve the accessibility of the website for people, e.g. with visual or hearing impairments, or learning disabilities. Further, simplifying the language used will make the content more accessible to people generally, and for those where English is not their first language. These changes will help more people understand and appreciate our role and function.</p> <p>A website which contains relevant information which helps ensure that people are treated equally such as information relating to disabled access etc.</p>
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## 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

	<b>Comment</b>
Eliminate unlawful discrimination	<p>Yes, this refers to discrimination because of a person's protected characteristic (direct); or discrimination that occurs when a provision, criteria or practice is applied that creates disproportionate disadvantage for a person with a protected characteristic as compared to those who do not share that characteristic (indirect).</p> <p>By improving the standard of our communication on our corporate website we can provide access to our information for more people, including those from our equalities groups.</p>

Advance equality of opportunity	Our website allows greater access to our work and sites for the growing number of people who access information online. 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	<p>This means fostering good relations, tackling prejudice and promoting understanding between people from different groups.</p> <p>By hosting feedback forms, surveys and polls we encourage feedback from our audiences and improved performance based on the resultant information.</p> <p>By hosting links to our social media platforms such as 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.</p>

**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.**

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## 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>We ran a survey on the home page of our website between Nov 2014 and Aug 2015.</p> <p>SNH Website Survey Results: <a href="#">A1692525</a></p> <p>Comments received included:</p> <p>Because I am over 50 I find your website fine, no problems with navigation</p> <p>Equalities related requests for improvements included:</p> <p>Age appropriate sections</p> <p>Simpler design and easier</p>	Survey Monkey – SNH Website Home page .... 2014 - 2015	Comments taken on board, to be addressed in specification of the new website

	<p>navigation</p> <p>Of respondees:</p> <p>44% had no frustrations with the content on the website</p>		
Disability	<p>The following relevant comments were received:</p> <p>Larger font sizes  Less wordy  Sharper imagery  More mobile friendly  Too much bureaucratic speak</p>	Survey Monkey – SNH Website Home page	<p>Font sizes on new website design templates are increased in size from the existing sizes. These comply withW3C recommendations.</p> <p>Plain English guidelines will be followed.</p> <p>It is likely that the editorial style of the SG website – mygov.scot be adopted.</p>
Gender	N/A		
Gender reassignment	N/A		
Marriage and civil partnership	N/A		
Pregnancy and maternity	N/A		
Race	N/A		
Religion or belief	N/A		

Sexual orientation	N/A		
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Additional comments:

## 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	Our website makes information about our natural heritage more accessible to a wider audience. It provides access to a range of materials to an audience that may be unable to experience nature first hand.	+	M
Disability	The range of readers and assistive devices associated with online activity helps ensure that access to our website is widely available.  By providing audio versions of our magazine and other key publications we provide wider access to our audiences and further increase the range of materials available. This will help increase awareness about the role of SNH, our work and will increase the enjoyment of Scotland's natural heritage	+	H
Gender	There is no evidence to suggest that access to our website differs significantly between male and females.	0	L
Gender reassignment	Neutral	0	L
Marriage and civil partnership	Neutral	0	L

Pregnancy and maternity	Neutral	0	L
Race	The use of Plain English in our written communications (both online and in print) as well as use of strong imagery, will help those whose first language is not English. Some of our key publications such as those aimed at visitors to the outdoors such as 'Explore for a day' are available in other languages. We will explore the possibility of translating other key elements of our published work on request.	+	H
Religion or belief	Neutral	0	L
Sexual orientation	Neutral	0	L

## 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	<p>We will continue to promote our website 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.</p> <p>We will try to support everybody to ensure that they can be involved. We are moving more and more to an online service and this may be a good option for those who can use and have access to technology. It can however present barriers to others with communication support needs. We also need to make sure that a good quality service is available offline and alternatives are offered for those cannot access our information and services online.</p>

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

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 website outputs are compliant and sympathetic to recent technological developments and best practice
3. Fostering good relations	<p>By liaising with specialist groups and agencies (such as RNIB) we would hope to further extend the reach of our information.</p> <p>By liaising with other agencies such as SG and SEPA, by looking at other's good practice examples we can continue to make improvements to the delivery of our information.</p>

## 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	The assessment demonstrates that due to the approach we are adopting, we are making a positive contribution to the delivering the equality duty.

## 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.	Equalities groups to be invited to be involved in user groups and testing	Pam Malcolm	12 months.
2.	Continue to use surveys to obtain user feedback and make improvements  Design any surveys so that equalities groups are		

	<p>represented, can participate and provide feedback.</p> <p>The resulting information can inform revisions to the future development and promotion of the website.</p>		
3.	<p>Contact RNIB and Scottish Accessible Information Forum (SAIF) to ensure that our website designs and digital outputs are compliant and sympathetic to recent technological developments and best practice.</p> <p>An increasing number of our audiences are accessing our information via mobile devices.</p>	Pam Malcolm	6 months.
4.	Scottish Alliance of Regional Equality Groups	Pam Malcolm	12 months.
5.	Take consultant recommendations for user requirements for the website into account	Pam Malcolm	8 months
6.	Ensure results of EqIA are built into the tender for the technical build	Pam Malcolm	2 months
7.	Ensure user testing with representatives of equalities is included within the	Pam Malcolm	8 months

	next phase of the project		
8.	Ensure accessible on mobile devices	Pam Malcolm	8 months
9.	Implement guidance on Writing for the Web including plain English information	Pam Malcolm/Web Project Team	8 months
10.	Ensure site-improve is run on future site and accessibility issues are addressed	Pam Malcolm	Ongoing – weekly on completion
11.	Ensure that future file format for documents is accessible	Pam Malcolm	8 months  Possibility of Open Document Format (ODF) being adopted for use rather than PDF, this provides access to an increased number of users as a software download is not required to view the document.

## Stage 9. Monitoring implementation

No.	How to Monitor	What information	When to monitor
1.	Online survey on the Home page	Feedback relating to the accessibility of the information	On completion of the site and then every 4 months
2.	Google Analytics	Statistics monitoring the accessibility of the information	Every 6 months
3.	Treejack Testing or similar	How easy it is to navigate via the Information Architecture	On completion of the site and then every 6 months
4.	Ensure user testing with representatives of equalities	Feedback relating to the accessibility of the information	On completion of the site and then every 8 months
5.	Testing accessibility on mobile device use	How accessible information is	On completion of site and then every 4 months
6.	Site Improve	How accessible information is	Weekly on completion
7.	Social media platforms, e.g. Twitter and Facebook	Feedback relating to how accessible the information is	Daily on receipt of comments
8.	Feedback received via the Website mailbox	Feedback relating to the accessibility of the information	Daily on receipt of comments

## 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, of 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	User testing (including equalities groups representatives) included in the submission. Details of how W3C AAA is to be obtained
How will you evaluate award criteria	User testing (including equalities groups representatives) included in the contract
Contract performance criteria	User testing (including equalities groups representatives) undertaken, recommendations and improvements undertaken

## 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 **SNH Corporate Website** and give my authorisation for the results of this assessment to be published on the SNH website.

<b>Name:</b>	<b>Joe Moore</b>
<b>Position:</b>	<b>Director Corporate Services (and Project SRO)</b>
<b>Authorisation date:</b>	<b>11 July 2016</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.