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?

Name of the policy[1]
Internal Communication Strategy – 2019-2022
Name of person leading the assessment[2]
Martin Stubbs-Partridge
Names of other team members
Emma Keenan, Lauren Spaven-Donn,
Is this a new or existing policy? New ☒ Existing being reviewed ☐ 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)	☒	☐
Will it have a significant effect on how other organisations operate?	☒	☐
Does it relate to an area where SNH has set equality outcomes[3]?	☒	☐
Does it relate to an area where there are known inequalities?	☐	☒

*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.*

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[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] Across the range of our activities, more people from BAME communities, people with disabilities and disadvantaged families, individuals and communities enjoy and benefit from nature
Through changes to recruitment and attraction procedures more people from BAME communities and people with disabilities apply for opportunities with SNH
We have an age-inclusive culture that supports and values everyone
We have reduced the gender pay gap to 9%

An EqIA is <u>not needed</u> ☐ 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@nature.scot . Please also retain a copy with your policy documents.

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[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?	Our strategy to improve the reach, visibility and impact of our internal communications is to focus on increasing levels of **engagement** and **connectedness**. Focusing on engagement means moving beyond a 'broadcast' mentality of communications, where information flows only one way, to a method where channels are used to drive interaction. **In the modern workplace information needs to be easily accessible, engaging and interactive.** When people are involved with something they care more about it. This applies whether that audience is a member of the public, a stakeholder, or works for SNH. We want all SNH colleagues to be motivated to sell the work of the organisation.
Who does the policy affect? (employees, customers, equality groups, stakeholders)	The policy primarily affects all colleagues including the SNH Board. In doing so it indirectly impacts customers, stakeholders and members of the general public.
What results/outcomes are intended?	The strategy builds on the principles outlined in the communication strategy. Its objectives are centred on **simplicity of experience** across five themes**:** • Think **content first**

	- Increase **collaboration** - Place more emphasis on **empowerment** - Help colleagues to feel more **connected to SNH** - Use **marketing and behavioural science** to support adoption and cultural change

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	The various technical products that will be considered will all come with in-built tools for collaboration, ease of use, presentation and display settings - which should benefit those members of staff who work with the solutions, and particularly enhance collaborative editing between staff working remotely from their teams (for whatever reason).
Advance equality of opportunity	Many people have slight impairments that they would not class significant enough to consider themselves disabled, but would nevertheless benefit from more targeted communications and adaptive technology. There is a tendency to view older people as being less able to cope with change or to use technology effectively. This needs to be taken into consideration if a major change is proposed. People with learning difficulties or who otherwise find change particularly challenging may find themselves adversely impacted by a switch to new technology. - Updating our intranet software will provide all staff with more seamless interaction between content, each other, and other business applications - Collaborative and mobile access will benefit those members of staff who work remotely, and particularly those travel frequently - Enable all members of staff who are disadvantaged by the existing software to take

		advantage of upgraded features
Foster good relations between groups of people		The collaboration tools available will make it easier than before for more people to interact with content, document creation and each other.

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

All		Sexual orientation	
Age	☒	Gender reassignment	
Disability	☒	Pregnancy and maternity	☒
Gender		Religion and belief	
Race		Marriage and civil partnership[5]	

If you decide that the assessment is not relevant to some groups, please say why below.
Gender: the upgrade of software and channels will not have any bias towards benefiting or disbenefiting any gender Race: the upgrade of software and channels will not have any bias towards benefiting or disbenefiting any race Sexual orientation: the upgrade of software and channels will not have any bias towards benefiting or disbenefiting any sexual orientation Gender reassignment: the upgrade of software and channels will not have any bias towards benefiting or disbenefiting any reassigned people. Religion and belief: the upgrade of software and channels will not have any bias towards benefiting or disbenefiting any religion or belief. Marriage and civil partnership: the upgrade of software and channels will not have any bias towards benefiting or disbenefiting any style of partnership.

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[5] In relation to unlawful discrimination in employment

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	The estimated population for Scotland on 30 June 2015 was 5,373,000, with 17% of people estimated to be aged under 16, 65% aged 16-64 and 18% aged 65 and over. See graphs below). 63% of our workforce is over 45. There has been a continuous increasing trend of employees aged between 55-64; and in the past 2 years this increase has accelerated slightly. In addition, in the past 2 years there has been a particular decline in the proportion of employees between the ages of 35-44. Fewer employees are leaving SNH through retirement; this has dropped by nearly 50% in 2018/19. In comparison, turnover rate in the 16-24 group was very high at 47%.	National Records of Scotland, 2015 SNH Equality Report 2019 (Appendix 1, Workforce Profile) People Survey Results 2018 Industry benchmarks, software vendors, government digital service, People Survey Internal Communication KPIs	SNH has a higher proportion of older employees than the general population but evidence shows that this should not be a barrier. The planned adoption programme will take into account these lessons and needs utilising networks such as the Change Partners. The strategy will provide people with more choice about how they access information. For example, older employees will still be able to access information through traditional means. Whereas some of younger employees may prefer to use blogs. Accurate analytics and support tactics will

	This also links with a high proportion of new starts being between the age of 16-24. This is likely due to the increase in the number of our one year graduate placements Evidence from SNH's People Survey demonstrates that that longer serving employees struggle more with change management and processes and tools. This will be considered so need to think about how we can support older people. This links into our refreshed equality outcome 'We have an age-inclusive culture that supports and values everyone' Personal knowledge of software usability and adoption programmes		be needed to ensure this group continue to engage following adoption investment.
Disability	Scottish Government Evidence Finder does not provide information on the nature of disabilities. 2.4% of employees identify as having a disability, however this is based on only 51% of the workforce declaring their status on the HR system, therefore likely to be significantly higher. We do not have an accurate breakdown of disabilities in SNH as disclosure is so low however we are aware of 10 employees who have had	SNH Equality Report 2019 (Appendix 1, Workforce Profile) Industry benchmarks, software vendors, government digital service	Accessibility needs to form part of technology and content option appraisals. Colleagues with a disability will find it even easier to work from home or another space that will be ideally adapted for them, because the software and channels will support more recent interface adaptations, and potentially allow better collaboration and targeted content. We will work with user groups including the

	reasonable adjustments made to support dyslexia in the workplace. Likewise we are aware of a number of staff with hearing and visual disabilities.

Personal knowledge of software usability. | | Change Partner Network.

We are currently reviewing web accessibility solutions and testing our website's accessibility with consideration being given to dyslexia, hearing and visual disabilities.

New technology will be evaluated against the international WCAG 2.1 AA accessibility standard – that form part of the Government Digital Service Standards. |
| Gender | The majority of colleagues in part-time employment in SNH are women (74%)

The ONS Study highlighted some differences in the activities that men and women carried out over the internet, with a higher percentage of women using it for social networking (69%), compared with men (60%). However, the proportion of men who watched videos on YouTube or similar was 13 percentage points higher than women, at 69% and 56% respectively.

SNH has over 35 offices across Scotland, some in very remote locations. Restrictions on travel mean we need to think more creatively on how to facilitate collaboration between teams and offices and also to | SNH Equality Report 2019 (Appendix 1, Flexible working)

Office for National Statistics (ONS) Internet Users UK 2018 report

Industry benchmarks, software vendors, government digital service | Part-time employees spend a disproportionate amount of time sifting relevant communication vs full-time colleagues. |

	make career opportunities inclusive to all. This will particularly benefit carers who are predominantly female by providing more flexibility Current communication practices are therefore biased towards full-time male colleagues. Targeting communications will help to mitigate current gender imbalance. Personal knowledge of software usability.		
Gender reassignment	Our workforce profile does not highlight any employees with this protected characteristic. No evidence of impact found.	SNH Equality Report 2019 (Appendix 1, Workforce Profile)	No gaps found and no action required.
Marriage and civil partnership	No evidence of impact found.	SNH Equality Report 2019 (Appendix 1, Workforce Profile)	No gaps found and no action required.
Pregnancy and maternity	Personal knowledge of software usability	Industry benchmarks, software vendors, government digital service	Those colleagues with pregnancy and maternity characteristics will find it even easier to work from home or another space that will be ideally adapted for them, because the software and channels will support more recent interface adaptations, and potentially allow better collaboration and targeted content.
Race	The majority of SNH employees have not disclosed their ethnicity (52%) and of our employees who have 0.66% are of a	SNH Equality Report 2019 (Appendix 1,	No gaps found and no action required.

	BAME background. However one of our equality outcomes is to increase people from BAME communities and people with disabilities applying for opportunities with SNH. No evidence of impact found currently however should be reviewed as workforce increases in diversity.	Workforce Profile)	
Religion or belief	The majority of SNH employees have not disclosed their religion (50%) and of our employees who have 26% have no religion. No evidence of impact found.	SNH Equality Report 2019 (Appendix 1, Workforce Profile)	No gaps found and no action required.
Sexual orientation	Only 1% of the SNH workforce has declared that they are LGB. The majority of SNH employees have not disclosed their sexual orientation (49%). No evidence of impact found.	SNH Equality Report 2019 (Appendix 1, Workforce Profile)	No gaps found and no action required.

Additional comments:
SNH has an ageing workforce, older people may find it more challenging to adapt to a technologies/ways of working, this statement is taken as fact but there is little evidence to support it. Older people often have less familiarity with technology, especially if they are retired, or they may have other issues (poor eyesight, arthritis, etc.) that can cause problems. The age profile of SNH should not be a barrier to change.

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	There is a perception that older people struggle more with technology, but the evidence does not back this up. The challenge is more attitudinal / cultural than ageism but nevertheless the two are obviously linked for some people.	-	M
Disability	There is no doubt that certain disabilities can make using certain technology more challenging. SNH has a good record in making adjustments to meet individuals' needs, from adjustable height desks to ergonomic keyboards and mice. It is possible to check how well new systems can support the needs of staff during the product evaluations.	-	H
Gender	There appears to be no evidence to suggest that women part-time are disproportionately disadvantaged in the workplace in terms of communication/technology/task management than men working full-time. But given any part-time worker is so (the very nature of non-targeted demand vs capacity to meet it) this aspect supports the ambition to be better at targeting content/communications at all groups irrespective of characteristic and working pattern.	+	H
Gender reassignment	No evidence of impact found.	0	

Marriage and civil partnership	No evidence of impact found.	0	
Pregnancy and maternity	There appears to be no evidence to suggest pregnancy and maternity disproportionately disadvantages women in the workplace in terms of communication/technology/task management. But given any part-time worker is so (the very nature of non-targeted demand vs capacity to meet it) this aspect supports the ambition to be better at targeting content/communications at all groups irrespective of characteristic and working pattern.	+	M
Race	No evidence of impact found.	0	
Religion or belief	No evidence of impact found.	0	
Sexual orientation	No evidence of impact found.	0	

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 (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 equality
Medium impact (The policy or process is somewhat equality relevant)	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
Low impact (The policy or process might be equality relevant)	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

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[6] 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	The priorities are to ensure that new systems/devices/content support the use of facilitative technologies such as text-to-speech screen readers, can be keyboard operated (i.e. without a mouse), are natively easy to read and can be user configurable to change font size and colour, with appropriately resourced adoption programmes in place .
2. Advancing equality of opportunity	Making systems accessible for those with severe issues makes it easier for everyone, especially those with mild visual impairment or minor/temporary physical challenges.
3. Fostering good relations	SNH has a good track record of supporting the needs of its staff: this is simply an extension of this into the selection of the software systems we all need to use.

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[6] 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 quality 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	Build in the requirement for any new systems/devices to support the needs of a range of people ensures that we will avoid discrimination, provide equal opportunities and foster good relations.

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.	Ensure accessibility forms part of technology options appraisal.	Martin Stubbs-Partridge	Determined by intranet project
2.	Evaluate and user test potential systems for accessibility.	Martin Stubbs-Partridge	Determined by intranet project
3.			

4.			

Stage 9.   Monitoring implementation and review

Evaluation of our internal communications is via the [Key Performance Indicators - Dashboard](#). This tracks a range of current and future criteria such as behaviour change through increased engagement/collaboration/targeted content.

Review date	Person responsible
28 May 2019	Martin Stubbs-Partridge

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	Will include Government Digital Service (GDS) [accessibility guidance](#) within any tender exercise.
How will you evaluate award criteria	Evaluate new technology against the international [WCAG 2.1 AA accessibility standard](#)
Contract performance criteria	Technical products will not be selected for inclusion unless they can prove to pass the WCAG 2.1 accessibility standard AND include the ability to tag (#) content and therefore enable targeting of content.

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 [Internal Communications Strategy 2019-22] and give my authorisation for the results of this assessment to be published on the SNH website.

Name:	Emma Keenan
Position:	Head of Communications
Authorisation date:	30 May 2019

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 save your EqIA to an appropriate folder. For example, if it relates to a project, you should save it to the project folder. Please also record summary information about your EqIA in the tracking spreadsheet B239231. Send the Objective ID to the Equality and Diversity Team diversity@snh.gov.uk for review and publication on the SNH website.

Guidance and tools

Glossary of key terms

[Equality and Human Rights Commission](#)

[Equality Challenge Unit](#)

Equality and Human Rights Commission (EHRC)

[EHRC guidance on public sector equality duty](#)

[EHRC guidance on impact assessments](#)

SNH

[EqIA – Process Map](#)