

Equality Impact Assessment

Communication and Engagement Plan

March 2026

1. Executive Summary

Environmental Standards Scotland (ESS) has undertaken an Equality Impact Assessment to assess the equality impact of the Communication and Engagement Plan. This report provides the background to the policy, a summary of its potential impacts and outlines amendments to the policy to mitigate the negative impacts that have been identified.

It is ESS' duty under the [public sector equality duty](#) to consider how the organisation promotes equality through its policies. Alongside this legal duty, ESS also seeks to actively advance equality more generally across our work. This EQIA evaluates the positive and negative impacts of the policy on individuals with protected characteristics (equality groups) as defined in the [Equality Act 2010](#).

ESS has also voluntarily chosen to consider the [Fairer Scotland Duty](#) in its work. ESS does this by integrating considerations of socio-economic disadvantage into its EQIA process.

The EQIA process is instrumental in ensuring that policies do not result in discrimination or victimisation of individuals with protected characteristics. Additionally, EQIAs can

assist in advancing equality of opportunity and help foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Having completed the EQIA process, ESS is satisfied that no unlawful discrimination will arise from the implementation of this policy.

2. Summary of the policy

Environmental Standards Scotland's Communications and Engagement Plan outlines how the organisation will communicate effectively as it delivers its 2026–2031 Strategy. Developed alongside the Strategy, the Plan sets out ESS's commitment to purposeful, independent, trusted, transparent and effective communication that strengthens public understanding of its role in improving compliance with environmental law.

3. What is the aim of the policy?

The primary aim of the plan is to set out Environmental Standard Scotland's engagement approach, priorities and actions to support the organisation in meeting its main Strategic Objectives.

The plan has four main priorities:

- increasing awareness of who we are and what we do by focusing on our impact
- building and maintaining credible relationships with our key audiences and networks
- ensuring that ESS communications are clear and accessible and put digital first
- empowering our staff and Board to talk confidently on behalf of ESS

4. Who is delivering the policy

The day-to-day work of communications and engagement will be undertaken by the ESS Corporate Services and Communications Team and led by the Senior

Communications Officer. However, all staff and Board members have a responsibility to communicate and engage with the public and their key networks.

5. Who may be impacted by the policy?

The plan will impact stakeholders and the public who engage with and read our work. Additionally, the plan will impact all staff members at ESS who have a responsibility to communicate with the public and stakeholders

6. Evidence

6.1 Summary of evidence gathered

To support the framing discussion, we undertook further research to inform our analysis. We primarily referred to data published by the Scottish and UK Government. Other sources of information were third-sector organisations, YouGov and Ofcom. These are all considered credible and trustworthy providers of information. Most of the evidence gathered was from the last five years.

6.2 Summary of engagement

A framing discussion was undertaken by seven ESS staff members from all three Departments.

7. Impacts

7.1 Summary of impacts identified

Across several protected characteristics—including age, disability, race, gender reassignment, pregnancy and maternity, and socio-economic disadvantage—the framing discussion and evidence gathering highlighted that a digital-first approach risks indirect discrimination.

Older adults, disabled people, ethnic minority communities, and those experiencing socio-economic disadvantage are less likely to have internet access. However, it was noted that ESS has many appropriate mitigations in place. By using a mix of digital communication, broadcast and print media, ESS helps ensure groups with lower digital access or confidence are not excluded. Additionally, the organisation's Community and Engagement programme specifically targets disadvantaged and underrepresented groups.

ESS uses many accessibility features such as captions, Easy Read documents, BSL interpretation, and plain English which help prevent discriminatory barriers for disabled people, ethnic minority communities who do not speak English as a first language, and those experiencing socio-economic disadvantage.

It was also agreed at the framing discussion that ESS' use of several online platforms (YouTube, X, LinkedIn and organisation webpage) reduces the risk of exclusion by age and reaches a wider audience.

It was noted in the framing discussion that in-person meetings and engagement sessions are more likely to exclude women with caring responsibilities, pregnant people and disabled individuals. Groups with caring responsibilities typically experience 'time poverty' and may also be excluded when meetings or events clash with school runs or caregiving duties.

Further data gathering highlighted trust in public institutions being a barrier to engagement for ethnic minorities, transgender people, LGB individuals and those experiencing socio-economic disadvantage.

Additional evidence collection found that the use of diverse and inclusive imagery in communications, and visible signals of support such as pronouns in email signatures, contribute to building trust with communities who may have historically lower confidence

in public institutions. Inclusive imagery normalises representation of certain groups and can foster better relationships.

From the initial framing exercise, and the consequent data gathering, no impacts were identified for marriage or civil partnership.

7.2 Summary of actions taken

Actions were implemented to reduce barriers to communication and engagement for people with protected characteristics.

Accessibility and proofreading guidance will be updated to highlight the importance of plain English. Additionally, staff refresher training on accessible communication will be considered.

A formal website accessibility health check will be undertaken during contract renewal. Accessible meeting and event guidance will be updated to reflect time-poverty considerations, ensuring meetings avoid clashing with caring responsibilities. The procedure will also be reviewed to include information on selecting transgender and non-binary friendly venues, and the consideration of religious needs and dietary requirements. A link to the religious dates calendar will be incorporated into the guidance.

The visibility of the translation services offered by ESS will be improved and information on this will be added to the organisation's webpage.

7.3 Legal implications

Having completed the EQIA process, ESS is satisfied that no unlawful discrimination will arise from review of this policy.

7.4 Review

The EQIA will be reviewed every three years by the Head of Corporate Services and Communications and a further EQIA will be undertaken at that stage if required. Any associated impacts will also be considered on an ongoing basis.

This EQIA has been reviewed by the Head of Department and approved by the Chief Executive.

Reviewed by: Rebecca Peppiette

Date: 11/03/2026

Approved by: Mark Roberts

Date: 16/03/2026