



# DESIGNATIONS STRATEGY - EQUALITY IMPACT ASSESSMENT

## SECTION ONE: ESSENTIAL INFORMATION

### About the Proposal/Project

1. **Proposal/Project:** Scotland's Protected Historic Places: a long-term strategy for historic environment designation
2. **Name of Lead Officer:** Philip Robertson
3. **Team:** Designations Service
4. **Directorate and Service:** Heritage Directorate/Designations Service
5. **Tel:** 0131 668 8843
6. **Email:** [philip.robertson@hes.scot](mailto:philip.robertson@hes.scot)
7. **Date started:** May 2024

### What is the Proposal?

1. **Budget or Other significant Financial Decision:** No
2. **Corporate Policy/Plan (New or Change):** No
3. **New or Changed HR Policy & Practice:** No
4. **New or Changed Service Delivery / Service Design:** No

### Who Does the Proposal effect?

1. **Stakeholders:** Yes
2. **Partners:** Yes
3. **Members of the Public:** Yes
4. **Employees:** Yes
5. **Other, please specify:** N/A

### The main aims and projected outcome of this proposal

National-level heritage designation is a core statutory function of HES. This is the system which HES uses to provide legal recognition for Scotland's most important historic sites and places. Designation provides a

foundation for a range of decision-making, from planning and land use decisions to maintenance of historic properties, and investigation of archaeological sites.

The strategy is intended to align with and contribute to the priorities set out in the following wider sectoral/HES strategies and plans:

- [Our Past Our Future: The strategy for Scotland's Historic Environment](#);
- [Heritage for All, the HES Corporate Plan 2025-28](#); and
- [HES Mainstreaming and Equality Outcomes Report 2025-29](#).

The designations strategy proposes a vision for what success will look like for designations in 2035:

**By 2035, our protected historic places will more fully reflect Scotland's rich and diverse heritage. Protecting these places and providing consistent, current, and accessible information about them will enable good decision-making, delivering better heritage outcomes and wider community benefits.**

This vision is underpinned by a mission which explains our purpose.

**'To identify, protect, and provide information about Scotland's most significant historic places. Our work supports planning authorities, owners, and others to make good decisions, ensuring our historic environment is well-managed for current and future generations.**

To work towards the vision, and to deliver the mission, the strategy also sets out priorities for the HES corporate plan period 2025-2028 under the 'Heritage for All' theme.

#### **Objective 1: Improving our information.**

**By March 2028, enhance the clarity and accuracy, accessibility and useability of our data and designation records so that Scotland's historic protected places are well-understood and valued.**

Many of our 55,000 protected place records and spatial data don't meet current standards, impacting people, communities, and businesses. We aim to improve at scale by engaging with our users, enhancing our data management, undertaking targeted record reviews, and technical innovation. This objective and the initiatives described should help to improve the quality of our designation records and improve how representative they are of Scotland's rich and diverse history.

#### **Objective 2: Improving our service.**

**Redesign our public offering to deliver good and timely decisions, publishing details of a revised approach by March 2026.**

Over the last two decades, much of our focus has been on responding to external proposals. While valuable, this can be inefficient and may not reflect long-term priorities. Responding to public requests will still be important but we will re-shape our service so that we can make timely and transparent decisions through effective prioritisation and engagement, and by streamlining processes and innovation. This will allow us to free up capacity for more proactive, project work in the longer term.

This objective and initiatives as described help to improve access to our decision-making processes, for example, ensuring disabled individuals can fully engage in the designation process, such as accessible formats for records and consultations.

#### **Objective 3: Understanding our impact.**

**By March 2028, capture and communicate baseline evidence and insights into the impacts of the current heritage protection systems.**

Feedback indicates that the purpose and impacts of heritage protection are unclear to the public. We aim to enhance understanding through research and engagement.

This objective and initiatives described should help us to address gaps in our knowledge about the impacts of designation, including potentially the impacts on protected characteristic groups.

#### Objective 4: Looking ahead.

**By March 2028, HES will be leading a collaborative and inclusive conversation on Scotland’s heritage protection system, to shape long-term (10-year) approaches and shorter-term priorities.**

We aim to establish a clearer and more forward-looking focus by working with others through inclusive engagement and research to examine our principles and policies, review our collective approach and explore alternatives to the current systems of protection.

This objective and the initiatives described would result in opportunities to engage with under-represented sections of society to ensure that their perspectives are considered in developing long-term priorities which will guide our work over the next ten years.

## SECTION TWO: FINANCIAL INFORMATION

### 1. Current spend on this Service (£’000s)

N/A

### 2. What is the dis-investment to this service budget (£’000s per annum)

N/A

### 3. What is the investment to this service budget (£’000s per annum)

N/A

### 4. Is this proposal a change to a charge or concession?

a) Dis-investment Total: N/A

b) Investment Total: N/A

### 5. When will the saving/return on investment be achieved?

a) Start Date: N/A

b) End Date (if any): N/A

### 6. Is this proposal a change to grant funding?

a) Dis-investment Total: N/A

b) Investment Total: N/A

### 7. Is this proposal a change to grant criteria?

No

## SECTION THREE: EVIDENCE

### A - Quantitative Evidence:

As Scotland has around 55,000 designated historic sites, including listed buildings, monuments, and landscapes, this strategy could affect a wide range of stakeholders such as owners, local authorities, businesses, and communities. Data on the impact of this strategy on protected characteristic groups is limited.

[National Statistics \(e.g. Scottish Household Survey 2023: Culture and Heritage report; and Population Census 2022\)](#).

As HES operates on a national level, it should seek to engage with people and communities across Scotland as a whole. As such, we use national-level information from the Scottish Household Survey (SHS) and Population Census 2022.

The [SHS](#) is held every year and the results published by the Scottish Government:

The last [population census](#) took place in 2022.

These national datasets lack specificity about engagement with the function of designation or with designated historic sites. The limited quantitative evidence that is available indicates that current public understanding of, and engagement with, our designation services remain confined to a small segment of the overall population.

The same is true of the involvement of protected characteristic groups, even if potential use in the future is undoubtedly larger.

#### [HES strategic review of historic environment designation](#)

The strategy addresses the findings of HES's 2024 strategic review which involved gathering of baseline data, internal and external stakeholder engagement.

Baseline data including case statistics (HES 2024, Towards a Strategy for long-term heritage designation in Scotland) highlight public involvement in heritage decisions over the past decade, with 407 sites protected and 10,000 designation decisions handled since 2015.

There is a general trend towards increasing public participation in our decision-making, with 3,600 participants in consultations via the Citizens Space platform since 2021, however these figures are driven by high-profile cases like Cumbernauld Civic Centre and Livi Skate Park. Yet, as HES does not currently gather information on special category data in our designation consultations, we have limited understanding of protected characteristic group participation in these processes.

In 2024, HES commissioned a survey of the public to gather information around the use and understanding of the services provided by Heritage Directorate including designation (JRS, December 2024, HES Heritage Directorate Work and Services Research Public Survey Results).

This survey gathered basic demographic data and achieved a representative sample of the Scottish population (e.g. responses were split roughly evenly by gender, over half were aged 45 years or older, 9% were from an ethnic background other than White, 19% of respondents had a disability, and responses were split across all 4 socio-economic groups).

Among 2,017 respondents, 64% showed interest in historic sites, 48% had not heard of HES, and 74% had never used the services of Heritage Directorate. Only 5% used the Heritage Portal to find information about designated sites and places and our decisions. 3% of respondents had asked us to consider a site or place for

designation, or to review an existing designation. The sample size is small, but if the figures are extrapolated against the population figures from the 2022 census, this might tentatively suggest some involvement with designation services involving between only 162,000-270,000 people out of an overall Scottish population of 5.4 million.

## **B - Qualitative Evidence**

[Social - case studies](#); [personal /group feedback / consultation / research /other](#):

The strategy and this EQIA has been shaped by the findings of the 2024 strategic review and feedback received through public consultation. This work began with a project to gather baseline data about the state of designations which highlighted issues relating to the coverage of our designations and the highly variable quality of existing records such as the fact that many of the older records do not reflect a modern understanding of cultural significance. Furthermore, records may contain language that we wouldn't use today. The next stage of the review involved assessing risks, reviewing principles and priorities, and engaging with staff across HES about our national-level designation function. We then partnered with MainStreet consultants to gather views from external heritage and planning stakeholders [Main Street 2024]. We targeted these groups because they have sufficient knowledge of our systems to offer informed views on how it is working. We recognise however, that the evidence that this has generated will not reflect the full range or equalities-related issues.

During preparation of the draft EQIA, we held further discussions with the HES Equalities Team and provided opportunities for input from equalities groups across HES. Qualitative research reports such as Heritage for Inclusive Growth (Royal Society of Arts, 2020) and Heritage, Health, and Wellbeing (The Heritage Alliance, 2020) have also been consulted.

### **Best Judgement**

#### **1. Has best judgement been used in place of data / research / evidence?**

Yes

#### **2. Who provided the best judgement and what was this based on?**

HES designations service with input from the HES Equalities Team, based on the findings of the review. The draft strategy was a product of extensive pre-consultation engagement with groups and individuals in the heritage and planning sector and beyond. We also engaged with staff across HES including equalities colleagues.

#### **What gaps in data / information were identified?**

At the time of developing the draft strategy, we lacked detailed information about the impact of heritage designation generally and about the extent to which protected characteristic groups are participating in our decision-making processes. We sought feedback at public consultation on the potential impacts of the strategy on people with protected characteristics and updated our strategy accordingly.

#### **Is further research necessary?**

No

#### **3. If NO, please state why.**

As this stage of development and drafting is complete, no further research is required. Delivery of the strategy is likely to involve research and analysis into equalities-related issues, both to gather evidence of impacts, and to report successfully on progress against objectives.

## SECTION FOUR: ENGAGEMENT/CONSULTATION WITH INDIVIDUALS OR ORGANISATIONS AFFECTED BY THE POLICY OR PROPOSAL

### Engagement/consultation programmes

**1. Has the proposal / policy / project been the subject of relevant engagement/consultation?**

Yes. Pre-consultation engagement followed by public consultation on draft strategy.

**2. If YES, please state who was engaged/consulted.**

#### 2024 – pre-consultation engagement

During the strategic review, a programme of engagement was undertaken with heritage and planning stakeholders on behalf of HES by MainStreet Consultants, involving the following:

Aberdeen City Heritage Trust; ALGAO Scotland; Forestry & Land Scotland; Scottish Government (Marine Conservation, Marine Directorate); Perth & Kinross Heritage Trust; University of Glasgow; University of Strathclyde; Morton Fraser MacRoberts LLP; Wessex Archaeology; NatureScot; University of Edinburgh; The Heritage Society; Scottish Government Planning, Architecture and Regeneration Division (PARD); SURF - Scotland's Regeneration Forum; Built Environment Forum for Scotland (BEFS); Turley; 20th Century Society; Montagu Evans; Society of Antiquities of Scotland; Guidelines; Royal Incorporation of Architects in Scotland (RIAS); Member of the Scottish Parliament; University of Strathclyde; Homes for Scotland; Barratt Homes; Taylor Wimpey; Scottish Civic Trust; Improvement Service; Scottish Canals; The Architectural Heritage Society of Scotland (AHSS); Conservation Officers Group (COG); Docomomo Scotland; Scotland's Gardens and Landscape Heritage (SGLH); Chief Reporter, Planning and Environmental Appeals Division (DPEA), Scottish Government; Stirling University; Guidelines; AOC Archaeology; Scottish Government; Scottish Government Culture and Historic Environment Division (CHED); Local Authorities via Heads of Planning Scotland meeting (City of Edinburgh; Stirling Council; Aberdeenshire Council; Western Isles Council; Aberdeen City Council; Angus Council; Argyll And Bute Council; Cairngorms PA; Clydeplan; Dumfries And Galloway Council; Dundee City Council; East Ayrshire Council; East Dunbarton Council; East Lothian Council; East Renfrewshire Council; Falkirk Council; Fife Council; Glasgow City Council; Highland Council; Inverclyde Council; Loch Lomond And The Trossachs PA; Midlothian Council; North Ayrshire Council; North Lanarkshire Council; Orkney Islands Council; Perth And Kinross Council: Renfrewshire Council; Scottish Borders Council; South Ayrshire Council; South Lanarkshire Council; Stirling Council; West Dunbartonshire Council; Western Isles Council.

The strategy's vision, mission, and priorities were developed from this engagement and the findings of the strategic review.

#### 2025 - Consultation on the draft strategy

During a public consultation on the draft strategy, we invited views from equality groups across Scotland through our communities' network to provide an opportunity for under-represented sections of society to engage with our plan and to foster good relations.

We received 39 responses including 16 from organisations and 19 from individuals.

The following named organisations responded to the consultation: Callander Heritage Society; Association of Local Government Archaeological Officers (Scotland); Orkney Islands Council; Architectural Heritage Fund; Architectural Heritage Society of Scotland (AHSS); Scottish Branch of IHBC; Aberdeenshire Council; Scottish

Borders Council; Scottish Borders Council Archaeology Service; Montagu Evans; The National Trust for Scotland; East Lothian Council Archaeology service; The Highland Council; Society of Antiquaries of Scotland; ScottishPower; Icen Projects; Shetland Islands Council; The City of Edinburgh Council; Docomomo Scotland; Historic Houses Scotland; The Royal Town Planning Institute Scotland; The ; Royal Incorporation of Architects in Scotland (The RIAS); Built Environment Forum Scotland; Pegasus Planning Group (submission by email).

We also partnered with BEFS to organise two stakeholder events – one in person and one online. BEFS submitted a report to us about these events.

**If NO engagement/consultation has been conducted, please state why.**

N/A

## Methodologies

### 3. How was the engagement/consultation carried out? What were the results? Please highlight and embed any consultation report/s.

#### Focus Group

Pre-consultation evidence-gathering and engagement led by our consultants MainStreet, involved stakeholders from the planning and heritage sector based on their detailed knowledge of the system. We kept the need for further focus-group discussion during the formal public consultation under review.

#### Survey

We held a public consultation on the strategy for six weeks from 20 May 2025 – 1 July 2025. An online survey was hosted on [Historic Environment Scotland's consultation website Citizen Space](#) during this time:

We promoted the survey through direct emails to heritage and planning stakeholders, our communities' network, and through a blog which we promoted on LinkedIn. There was a press release on our HES news centre.

We asked a question in the survey about the impact that the Plan would have on protected characteristics.

The results and full analysis are provided in our consultation report and summarised below. The analysis from the public consultation will be published alongside the strategy.

When asked 'what impact do you think our strategy would have on people with the following characteristics?' the responses were as follows:

	Positive impact	Negative impact	No impact	Not sure	No response
<b>Age</b>	9	0	11	9	10
<b>Disability</b>	10	0	7	12	10
<b>Gender reassignment</b>	4	0	16	9	10
<b>Marriage and civil partnerships</b>	2	0	16	11	10
<b>Pregnancy/maternity</b>	3	0	15	11	10
<b>Race</b>	8	0	10	11	10
<b>Religion and belief</b>	5	0	9	15	10
<b>Sex</b>	4	0	14	10	11
<b>Sexual orientation</b>	5	0	14	10	10
<b>Socio-economic background</b>	10	0	8	11	10

Twenty respondents provided free text comments on the strategy's potential impact. Most responses were neutral or cautiously supportive, with some expressing clear support for greater inclusivity and accessibility. Several respondents felt the current designation system is already inclusive and non-discriminatory and expect this to continue under the proposed strategy; some others questioned the relevance of protected characteristics in this context or felt the strategy lacked sufficient detail to assess its impact meaningfully, calling for clearer articulation of intended actions.

Several comments highlighted the potential for positive impacts, particularly in relation to race, socio-economic background, and disability. Respondents noted that broader community representation and more inclusive heritage recognition could help address diversity and equalities issues. BEFS members emphasised the opportunity to engage new community groups in the delivery of the strategy. Accessibility was a recurring theme, with calls to ensure both digital and physical access for disabled users. Respondents stressed that accessibility should be a core consideration, not an afterthought. There were also calls to engage more effectively with diverse communities and to address unconscious bias in heritage designation.

We invited comments from staff via a Microsoft Forms questionnaire. However, we did not specifically invited feedback on impacts on protected characteristics. A report of staff feedback.

#### Display / Exhibitions

No.

#### User Panels

No.

#### Public Event

During the evidence-gathering phase we organised meetings with specific heritage/planning stakeholder groups. During the public consultation on our draft strategy, we partnered with the Built Environment Forum of Scotland to organise two public events – one in person and one online. These were promoted by BEFS through its membership. BEFS provided a summary report about these events and the key findings.

### Outcomes

#### **4. Has the proposal / policy / project been reviewed / changed because of the engagement/consultation? If yes – identify changes.**

Yes. Pre engagement informed the consultation draft, and the final version has been informed by the engagement sessions and responses to the public consultation.

#### **5. Have the results been fed back?**

Our consultation report will be available with publication of the final strategy. We will be promoting this through the HES community's network to ensure we are providing feedback to equalities groups.

#### **6. Is further engagement/consultation recommended?**

We intend to continue to engage on these issues with communities and equalities groups through events to be organised as part of the Talking About Heritage Project over the next 3-6 months. Our intention is to use this project as a key mechanism to ensure we are having inclusive conversations to shape our priorities over the next three years.

## SECTION FIVE: PARTNERS / OTHER STAKEHOLDERS

### Interested parties

- 1. Which sectors are likely to have an interest in or be affected by the proposal / policy / project?  
Describe the interest / effect.**

#### Business

Business operating in the heritage sector and beyond are likely to be both interested and may be affected by changes in our service, particularly in respect of how we prioritise external requests. We have considered impacts through a separate Business Regulatory Impact assessment process and asked for feedback on this at consultation.

#### Local Councils/Community Planning Partners

As decision-makers and asset owners of the historic environment local authorities will be both interested and affected although there will be no change to local authority planning functions and no additional burdens. Community Planning Partners with their interest in planning and place-making will also be interested. We sought input from Local authorities throughout the engagement and consultation process, and their responses have contributed to the development of the strategy.

#### Wider Heritage/Conservation/Tourism Sectors

The heritage and planning sector in Scotland will be interested and affected by the strategy. Their input has been sought to help shape the strategy during the evidence-gathering phase and public consultation.

#### Voluntary / Other Sectors

Third sector heritage groups will be interested in the strategy. Their input has been sought to help shape the strategy during the evidence-gathering phase and public consultation.

#### Other(s):

Owners and occupiers of designated sites and places may be interested and affected by the strategy. We sought input from owners at public consultation through representative bodies.

## SECTION SIX: ASSESSMENT OUTCOME

- 1. Only one of following statements best matches your assessment of this proposal / policy / project. Please select one and provide your reasons.**

### **No major change required.**

The feedback we received at public consultation did not indicate that any significant changes are required but reinforced the value of some of the objectives in our strategy, and of reaching out to equalities groups and communities to ensure our work delivers positive outcomes.

We have however made changes to be more explicit about our commitment to address equalities issues, for example ‘Ensuring our records reflect the diversity of Scotland’s people and address out-dated language and values.’

The feedback has also been considered in developing our implementation plan for the next three years, which will guide how we deliver the strategy.

## SECTION SEVEN: ACTION PLANNING

### implementation plan 2025-8

- 1. As a result of performing this assessment, what actions are proposed to remove or reduce any risks of adverse outcomes identified for employees, customers; participants; service users or other people who share characteristics protected by the Equality Act.**

#### Equality of opportunity to participate in the designations process

Through our strategy implementation plan 2025-28, we will:

- Make sure inclusive engagement is part of how we develop designation policies, set priorities, and carry out projects.
- Provide training for staff on inclusive heritage.
- Include research on how our work affects people with protected characteristics (and where this overlaps with socio-economic status) and how to measure these impacts.

This has the following equality outcome: Our Society (We empower underrepresented communities in shaping change and creating opportunities promoting equality and justice).

#### Risk of public sector equality duty not being communicated to projects encompassed within the strategy, resulting in poor equality outcomes.

Through our strategy implementation plan, we will:

- Ensure that projects under this strategy (such as Talking About Heritage, and the review of policy and guidance, or work on longer-term priorities) must undergo equalities impact screening, and track participation and report progress against equalities outcomes.

This has the following equality outcome: Our Services (We work to remove barriers to access, creating meaningful engagement opportunities for everyone regardless of who they are.)

#### Risk of exclusion from participation and further under-representation in designation processes.

Through our strategy implementation plan, we will:

- streamline designation processes without risk of excluding participation or under-represented groups.
- Embed inclusive engagement principles throughout our work.
- For people who may face barriers to technology, we will ensure documentation meets accessibility standards (e.g., WCAG 2.2 for documents created since 2018).

This has the following equality outcome: Our Services (We work to remove barriers to access, creating meaningful engagement opportunities for everyone regardless of who they are.)

#### Avoiding indirect exclusion through our prioritisation work

Through our strategy implementation plan, when revising service standards and developing prioritisation frameworks, we will:

- Make sure these do not exclude groups with protected characteristics.
- Carry out regular reviews as the process develops, in line with our equality's duties.

This has the following equality outcome: Our Services (We work to remove barriers to access, creating meaningful engagement opportunities for everyone regardless of who they are.)

**2. Where a negative impact on diverse individuals/ communities has been identified what is the justification for continuing with the proposal / policy / project?**

N/A

**3. Are actions being reported to ELT? If yes when and how?**

Yes – the strategy is underpinned by a three-year implementation plan. ELT have agreed that we will begin delivery of this plan. Progress will be reported through annual directorate planning and reporting processes.

**Date Reported to ELT** - 11 November 2025 – ELT approved the final strategy for publication and gave the go-ahead to begin delivery.

## SECTION EIGHT: LEAD OFFICER SIGN OFF

<b>Signature:</b>	<b>Date:</b>
Philip Robertson	30/10/2025

## SECTION NINE: HEAD OF SERVICE/DIRECTORATE SIGN OFF

<b>Signature:</b>	<b>Date:</b>
Dara Parsons	31/10/2025