

Mainstreaming equalities at Environmental Standards Scotland

An update on mainstreaming
equalities, our progress against
our equality outcomes, and
gender representation on our
Board

April 2025

ENVIRONMENTAL
Standards Scotland
Ìrean Àrainneachdail na h-Alba

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1. Introduction

1.1 This report provides an update on the actions Environmental Standards Scotland (ESS) has taken to mainstream equality in our organisation. This will be the first update on progress towards achieving our equality outcomes 2023-27.

About Environmental Standards Scotland

1.2 Our job is to ensure that environmental law in Scotland is effective, and that public bodies comply with it. We are accountable to the Scottish Parliament and are independent of the Scottish Government. Our remit covers all Scottish public authorities including, for example: councils; health boards; the Scottish Government and its agencies.

Our Strategic Plan 2022-25

1.3 In November 2022, the Scottish Parliament approved our [Strategic Plan](#), which sets out how we plan to deliver our work.

1.4 Within this Plan we set out that we are ambitious for Scotland's environment and our Vision is that:

‘Scotland's people and nature benefit from a high quality environment and are protected from harm through the consistent application of effective environmental laws, which are recognised internationally as setting high standards.’

1.5 Our Mission Statement is that:

‘We will ensure that Scotland's environmental laws and standards are complied with, and their effectiveness improved to achieve Scotland's ambitious targets for the environment, nature and climate change.’

1.6 We have a set of Principles that guide the way we will work. We will:

- target our efforts and resources where we can add most value – focusing where our contribution is needed most, or will make most difference
- seek to resolve issues through agreement wherever possible – having recourse to our formal powers where we judge it is necessary to deliver the outcome expected
- be evidence driven – seeking a wide range of inputs and expertise to inform our work and to support our decisions and advice
- be open and transparent – keeping people informed about the progress of our work and providing opportunities to input to and influence it
- seek opportunities to work in partnership with others – working closely with all relevant stakeholders to ensure that our collective efforts deliver benefits for environmental protection and enhancement

1.7 In our Strategic Plan, we recognise that an equal and diverse workforce will support us in becoming a high-performing organisation. We want to embed an inclusive culture and have developed our [Equality and Diversity Policy](#) and [People Strategy](#).

1.8 ESS' People Strategy draws together our wider range of people-related plans, policies and initiatives under three key pillars below, with diversity, equality, inclusion and wellbeing being fundamental to everything we do:

- **attracting** and keeping the right people
- **developing** and nurturing our people
- **enabling** great performance and delivery

1.9 The interaction of all these policies is summarised on page 4.

Strategic Plan (2022-2025)

Organisational values

We are: independent, transparent, trusted and effective

Our staff feel: respected, included, innovative and collaborative

[Strategic Plan](#)

Shaping our organisational culture

We will:

develop a supportive culture and working environment

People Strategy

Attracting and keeping the right people

Developing and nurturing our people

Enabling great performance and delivery

Wider range of specific policies

Examples:

fairness at work, recruitment, hybrid working

[Explore | SG Thrive \(learn.link\)](#)

Equalities and Diversity Policy principles

Respect, inclusivity, fairness and support

[Equalities and Diversity Policy](#)

Mainstreaming Equalities equality outcome planning and commitments (2023-2027)

Outcome 1: ESS' performance is enhanced by having a workforce whose diversity is more representative of Scotland

Outcome 2: ESS' staff are empowered by removing barriers to an accessible and inclusive working environment

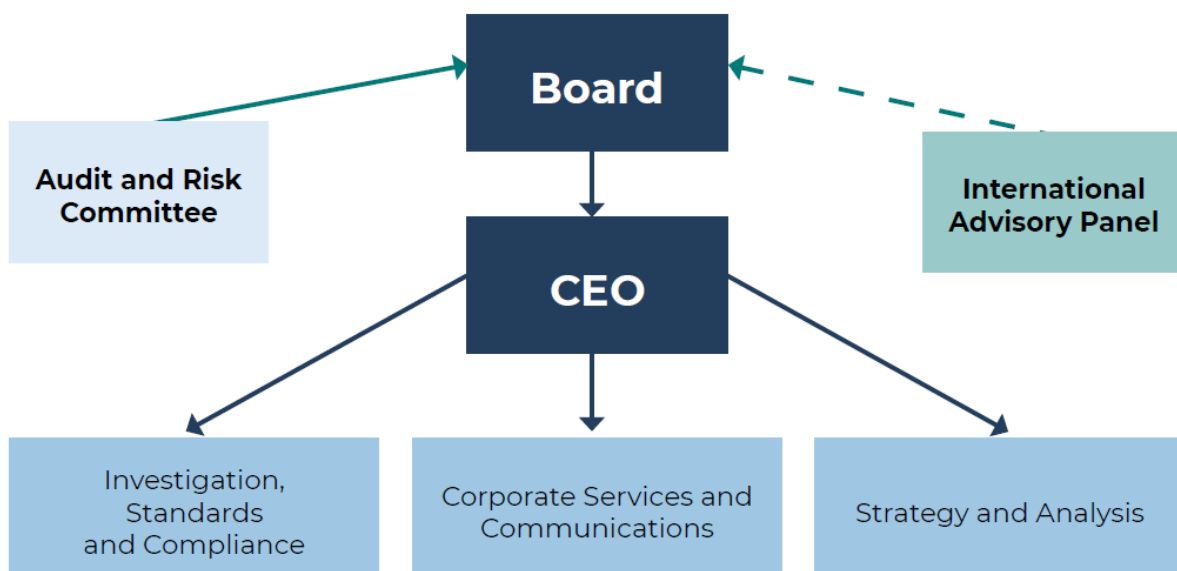
Outcome 3: all people of Scotland can readily understand and are enabled to access ESS' services

[Mainstreaming Equalities Report](#)

1.10 We are currently reviewing our Strategic Plan and developing our next Strategy for 2026-31. A public consultation on our next Strategy will run for 12 weeks over summer 2025.

Our people

1.11 We are led by a [Chair and Board](#), who are experienced in leading independent scrutiny organisations. They have a range of expertise in environmental law, policy, regulation and corporate governance. Our team is headed by a Chief Executive and organised into three specialist teams.



1.12 At the time of publication we have 25 employees¹ based across Scotland, with a main office in Edinburgh.

¹ As per the definition of “employee” listed at s.83 of the [Equality Act 2010](#) (legislation.gov.uk)

2. Our legal duties under the Equality Act 2010

2.1 As a public body, ESS must address inequality and discrimination in its work.

The Public Sector Equality Duty ('the general duty'), which is part of the [Equality Act 2010](#) ('the Act'), requires that ESS, in the exercise of its functions, has due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

2.2 The relevant protected characteristics listed in the Act are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

2.3 As part of the [Equality Act 2010 \(Specific Duties\) \(Scotland\) Regulations 2012](#) ('the Regulations')² we must:

- report on mainstreaming the equality duty
- publish equality outcomes
- assess and review policies and practices
- gather and use employee information
- consider award criteria and conditions in relation to public sector procurement
- publish this mainstreaming report, equality outcomes and progress updates in a manner which is accessible

² ESS became a listed authority under [The Equality Act 2010 \(Specific Duties\) \(Scotland\) Amendment Regulations 2022 \(legislation.gov.uk\)](#)

3. Mainstreaming equalities through our equality outcomes

3.1 Since vesting in 2021, we have taken early steps to ensure equality, diversity and inclusion are embedded in ESS' ways of working and day-to-day operations.

3.2 We published our first set of equality outcomes in April 2023, accompanied by an action plan to achieve these. In March 2024, we finalised and published our Equality and Diversity Policy, setting out the roles and responsibilities of all at ESS in supporting equalities considerations in our employment practices and the service we provide. In October 2024, following a series of workshops, a working group from across ESS' three departments developed the ESS People Strategy.



3.3 Furthermore, to ensure a range of perspectives, ideas and 'doing power' are applied to equalities at ESS, we implemented an Equality Champion programme in 2024. This includes volunteer champions from each team at ESS, including the Executive Team and the ESS Board, who:

- ensure equality, diversity and inclusion are considered at all level of decision-making at ESS
- support the delivery of the equality outcome action plan
- explore training opportunities and share learning with wider team
- provide constructive feedback and raise general awareness of equalities

3.4 This section will provide an update on the work that the ESS team and Equality Champions have undertaken to achieve ESS' equality outcomes.

Outcome 1: ESS' performance is enhanced by having a workforce whose diversity is more representative of Scotland

3.5 Our first equality outcome seeks to ensure that ESS has a diverse workforce that represents the population of Scotland.

3.6 This outcome seeks to:

- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not

3.7 This outcome is relevant to all protected characteristics. However, when developing this outcome, we drew upon data gathered on the makeup of ESS' workforce at the time to understand which groups were underrepresented within ESS' staffing and where we may need to focus recruitment efforts. In our analysis, we identified that two groups were underrepresented versus the Scottish population: young people and disabled people.

3.8 The following table on pages 11-12 outlines the actions we have taken to achieve this equality outcome. Key highlights have included:

- achieving Disability Confident Employer status
- hosting student placements and mentees
- organising all-staff training sessions, such as an introduction to allyship
- implementation of an Equality Champion programme



ESS' commitment to providing personalised guidance and support has been wholehearted, offering me a productive and tailored experience.

Annie Scott, University of Edinburgh

UKELA mentoring scheme participant

3.9 The following table also details the next steps where appropriate, to ensure we continue to meet our equality outcomes. As noted when developing our equality outcomes, we are aware that the small size of our organisation is a limitation when seeking to establish a diverse workforce. The composition of ESS' staff may either fluctuate significantly versus Scotland's population, or remain largely unchanged due to a low turnover rate. For this reason, while we have used the data to inform our approach to attracting and retaining members of staff from underrepresented backgrounds, we keep an open mind and endeavour to maintain a broad-reaching communication strategy in this regard.

Action	Progress 2023-25	Next steps 2025-27
We will embed Employee Equality and Diversity Monitoring into staff inductions.	Equality and diversity monitoring forms are now included in the induction checklist for new staff members.	We will continue to refresh the data we gather and monitor trends going forward, as well as expanding the data collection to include socioeconomic status. We will also look for ways to better understand the data we are collecting, for example, analysing data and trends at different points of the employee journey (i.e. exit interviews).
We will set up systems to actively monitor and understand, as far as possible, how many applications are made under the Disability Confident Scheme.	We now have a central record of applications made under the Disability Confident Scheme.	We will continue to monitor trends in applications and use this data to support and inform our application of the Disability Confident Scheme, as we move to being an accredited Disability Confident Employer.
We will increase and diversify the organisations and networks we use to advertise our job vacancies.	We have identified a number of avenues to promote our job vacancies, including more informal networks.	We will draw on the list of organisations and networks identified and look to embed these into the recruitment process, so that every recruitment campaign at ESS reaches a diverse audience.
We will develop our Civil Service Careers webpage to embed equality principles.	We have built on the content available on our Civil Service Careers webpage , including a blog from one of our Civil Service Fast Stream colleagues and our statement on Fair Work First , to provide key information to prospective applicants and to appeal to a wider audience.	We will continue to develop this webpage and the ESS website, ensuring content is kept up to date while seeking opportunities to improve the resources available for prospective applicants.
We will implement a programme of student placements within ESS.	We have welcomed student placements from the Scottish Graduate School of Social Science (SGSSS) to undertake discrete pieces of work within our Strategy and Analysis team.	As well as continued engagement with the SGSSS student placement programme, we will explore further opportunities to provide student placements, for example through our Corporate Services and Communications team.
We will engage with educational institutions to raise awareness of ESS in general and as a potential employer.	Due to ESS' small size and low turnover rate, we have not carried out extensive engagement with education institutions as originally planned (for example, we have not attended student job fairs). However we have engaged with educational settings in other ways, through our internship and mentorship placements, as well as carrying out a guest lecture at the University of Edinburgh and University of Stirling.	As ESS grows we will remain mindful of opportunities to engage with educational institutions and promote our organisation as a prospective employer for young people and graduates.

Action	Progress 2023-25	Next steps 2025-27
We will engage with mentoring programmes to raise our profile with underrepresented individuals and share knowledge and expertise in our field.	For the past two years we have provided mentorship opportunities through the UK Environmental Law Association's James Adler scheme . We have received positive feedback on our participation in this scheme.	We remain committed to participating in this mentorship scheme in future years, as well as exploring further opportunities to expand our participation, or engage with new schemes.
We will publish an Equality and Diversity Policy.	We have published our Equality and Diversity Policy on the ESS website.	We will keep this policy under review and ensure the policy commitments are delivered by ESS' staff and Board.
We will identify and train an Equality Champion within our staff and our Board membership.	We have implemented an Equality Champion programme, which has brought together committed individuals from across ESS' three departments and the ESS Board.	We are currently identifying enhanced training opportunities to support our Champions in their role. Since moving into a shared office with Consumer Scotland, we are also planning to collaborate with their Equality Champions and share resources and learning in this respect.
We will increase the visibility of equalities considerations in our Board meetings by including a regular update from the Board Equality Champion.	We have embedded a regular Equality Champion update into our Board meeting agendas. In addition, each item discussed at the ESS Board will set out the equalities considerations taken as part of that report/project.	We continue to develop our approach to ensuring the general duty is considered at all levels of decision-making. An all-staff training session was organised on equality impact assessments (EqIA) and we are currently exploring how to incorporate this learning across the board.
We will develop an enhanced mandatory equalities training programme for both staff and Board members.	We are committed to delivering a corporate learning programme across all teams, which includes equalities training. Introduction to allyship and equality impact assessments are examples of training that have already been carried out for all staff. Staff have also been offered the opportunity to undertake first aid, mental health first aid, and display screen equipment (DSE) assessor training, for which several members of the team are now certified.	ESS' Equality Champions will support implementation of the corporate equalities training programme. We hold all-staff days four or five times a year, and it is intended that the Equality Champions will organise at least one of these with an equalities focus.
We will ensure all staff taking part in recruitment interviews have specific interviewer training.	We have developed a bespoke training package for all members of staff participating in interview panels.	We continue to review this training and monitor participation to ensure that mandatory training is adhered to.

Outcome 2: ESS' staff are empowered by removing barriers to an accessible and inclusive working environment

3.10 Our second equality outcome seeks to ensure that our staff are empowered and enabled to carry out their job by providing a working environment that is accessible, inclusive, and takes account of different needs.

3.11 This outcome seeks to:

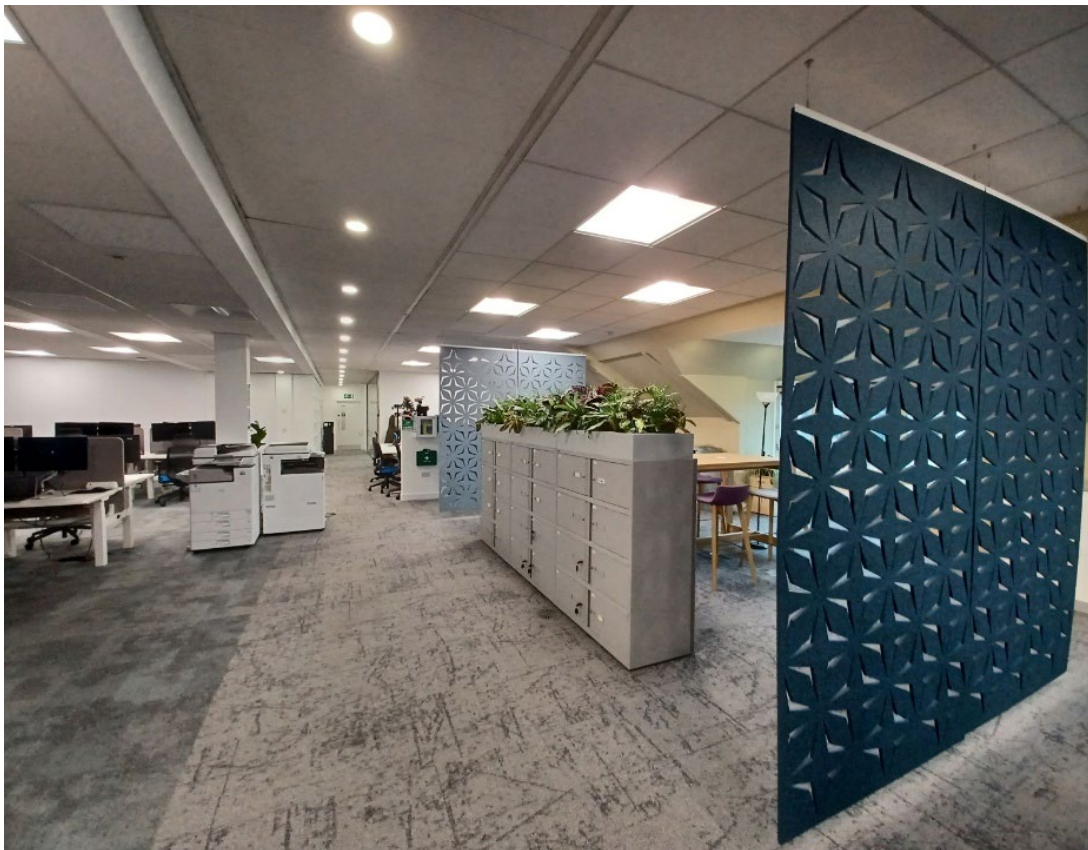
- eliminate discrimination, harassment, victimisation or any other prohibited conduct
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not

3.12 This outcome is relevant to all protected characteristics, as we aim to build a working environment supportive of all needs and backgrounds. However a key focus of this outcome was to ensure that our office accommodation is fundamentally accessible for those with disabilities.

3.13 In early 2024, together with Consumer Scotland we moved into a different office space within our base at Thistle House, Edinburgh, and took the opportunity to retrofit our new accommodation. In order to ensure accessibility was at the centre of the retrofit we engaged with external consultants with expertise in this area. With an understanding of the 'must-haves' of an inclusive space, we then ran workshops with staff to get an understanding of the wants and needs of the people who will be using the space. A working group of staff from both ESS and Consumer Scotland also provided feedback and insight throughout the process.

3.14 Key features of the office redesign included:

- a new wellbeing room – a dedicated private space that staff can use for anything from breastfeeding/pumping to practicing faith to just needing a moment
- collaborative, breakout spaces in the main office, in addition to more formal meeting rooms
- new tech to support staff in their work, such as portable monitors, standing desks and videoconferencing equipment



3.15 We have gathered feedback from staff to understand whether the retrofit has improved ESS' working environment and to seek further opportunities to make the space more accessible. This feedback has been very positive, with an average score of 4.2 out of 5, and no scores lower than 3, on a five-point scale from 'not empowered at all' to 'enabled to fulfil role well'. Even more importantly, we have received helpful suggestions for making the space even more accessible, such as changes to soundproofing and lighting.

3.16 More detail on the actions we have taken is available in the following table.

Action	Progress 2023-25	Next steps 2025-27
We will run workshops with staff to inform the design of a new office space.	We held workshops with external consultants that all staff could attend. This made sure that all voices at ESS were taken account of and everyone could be part of 'co-designing' their working environment. A working group with cross-team membership was also established to provide feedback and steer the retrofit throughout the process.	The office working group continues to meet and discuss any issues or opportunities to improve the space.
We will engage with accessibility consultants to inform the design of a new office space.	We worked with third-party contractors to re-design our office space. Their expertise ensured that the office is physically accessible and takes account of various other needs, such as neurodiversity.	We continue to seek feedback from staff on the suitability of the office and are working through issues flagged to ensure any remaining barriers to accessible working are removed.
We will develop our own accessibility audit checklist for any changes to our workspace.	Throughout the design and build of our office retrofit, our third-party contractors ensured that all accessibility regulations and requirements were adhered to.	Following this project, we will carry out a follow-up audit of the accessibility of the space. This will ensure that, now that the office is lived in and ad hoc changes applied, standards will be maintained.
We will explore options to set up an equalities working group with organisations sharing our office building.	As we moved into this office space with fellow public body Consumer Scotland, the office working group was made up of members from both organisations. This brought a bigger range of perspectives and experiences to the discussions.	In addition to the office working group, both organisations have now set up an Equality Champion programme and we are liaising with Consumer Scotland to bring the two together. This group will explore common themes across equalities, and will share ideas and resources particularly on office accessibility.
We will continue to develop and offer a catalogue of homeworking and hybrid equipment.	We have built our catalogue of homeworking equipment to ensure our staff are enabled to work comfortably whether at home or in the office. This offer includes equipment such as ergonomic mice, wrist rests, foot stools, kneeling chairs, etc. to support various physical needs.	As part of gathering feedback on the office space we have asked for ideas on any further equipment that may support our staff to carry out their role, for example, noise cancelling headphones. We will keep using feedback from our staff to inform the homeworking offer available.
We will train a member of staff in Display Screen Equipment (DSE) assessments.	Two members of ESS staff attended training to become certified in DSE assessments.	We continue to ensure DSE assessments are part of staff inductions, and that staff are aware of the in-house support available.
We will raise awareness of accessibility considerations within our staff and Board with appropriate training.	We have built on the training provided to staff to ensure equalities considerations, including accessibility are taken into account at all levels of decision-making. Part of our all-staff EqIA training, attended by the Chair and Board Equality Champion, focused on considering equalities in different types of policies and projects. We also provided all-staff training on proofreading and style to improve the accessibility of our communications.	The Equality Champions will continue this work, by exploring learning opportunities and delivering through all-staff days and ad hoc sessions.

Outcome 3: All people of Scotland can readily understand and are enabled to access ESS' services

3.17 Our third equality outcome seeks to ensure that we provide an accessible service to the people of Scotland, whether through the representation process or in the way we communicate our work.

3.18 This outcome seeks to:

- eliminate discrimination, harassment, victimisation or any other prohibited conduct
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not

3.19 This outcome is relevant to all protected characteristics as we look to ensure anyone can access and understand our services. Now that we have gathered feedback from, and diversity data regarding, people who have made representations to us, this will allow us to understand who is not accessing our services and inform future engagement.

3.20 The following table on pages 17-18 outlines the actions we have taken to meet this equality outcome, and next steps. Key highlights include:

- our community engagement programme, which has engaged with groups such as the Ethnic Minority Environmental Network, Poverty Alliance and 2050 Climate Group
- building an accessible website, improving navigability and providing information in a variety of formats
- building our understanding of the impact of our operations and training all staff in equality impact assessments



Action	Progress 2023-25	Next steps 2025-27
We will implement an engagement programme to raise awareness of ESS amongst different communities.	We launched our community engagement programme in 2023 and have reached out to groups across Scotland, from the Highlands and Islands to East Lothian. As well as communities of place, we have reached out to communities of interest including youth groups, ethnic minority groups, and socioeconomic groups, as well as those with environmental interests. This outreach work allows us to inform communities about the work that ESS does, listen to the local concerns of groups, and support communities to make representations to us.	Our community engagement programme continues to be a core strand of ESS' work and, through ESS' Strategy, we are committed to keeping communities central to our service provision.
We will seek accessibility-specific feedback following stakeholder events.	We have developed a standard feedback template issued to attendees which includes a question on how accessible the event was, whether that is the location, the format, the quality of videoconferencing, etc.	We will use this feedback to improve accessibility of stakeholder events going forward. Although ESS has not hosted numerous events of its own during this reporting period, we will soon be holding a number of engagements for the development of ESS' next Strategy. Previous feedback will inform the planning for this, and we will take this opportunity to gather more data from those we meet with.
We will improve our process for monitoring equality and diversity data of our service users to increase response rates.	We have increased the visibility of our equality and diversity monitoring forms for those making representations to us. For example, if someone submits a representation via our webform, they will be automatically directed to the diversity questionnaire. Further, we issue these questionnaires alongside our customer service feedback surveys which has increased the response rate.	We will continue to look for ways to increase response rates and ensure the data gathered is used to make meaningful change to our approach and ways of working.
We will regularly review our Accessibility Guide.	We have undertaken work to improve our accessibility guidance and embed this across the organisation. We have developed templates with accessibility requirements built in. We have held all-staff training on proofreading to ensure the approach across ESS' three teams is consistent. We have developed a scientific writing guide to supplement existing guidance.	We keep our style, guidance and templates under review. Our next step is to bring the various pieces of guidance into a one-stop-shop document. Accessibility will also be a key theme when refreshing our Communication and Engagement Strategy alongside ESS' next Strategy.

Action	Progress 2023-25	Next steps 2025-27
We will enhance our training offer for staff and Board members relating to accessible communications.	In addition to all-staff proofreading training, members of staff have participated in training for using Plain English and developing accessible data visualisations. Learning from these sessions is incorporated into our internal guidance.	We will consider further training opportunities as part of our corporate learning and development programme and alongside the review of our Communication and Engagement Strategy.
We will redevelop our website to improve access to our online information and services.	Following a series of internal and external workshops, and informed by written feedback gathered from ESS' website users, we refreshed the look and feel of our website. This has improved navigability so that users can more easily find the information they seek.	We will continue to monitor feedback and implement improvements as required.
We will make clear the availability of documents in alternative languages and formats, where possible.	As part of the website redevelopment we placed a heavy focus on building accessible html reports into our offer, in addition to PDFs. We have also introduced a suite of documents available in Easy Read format, for example, ' What is ESS? '. Where appropriate, we have produced video content to accompany key documents, such as our six-monthly work updates .	We will continue to identify key documents that can be provided in alternative formats, such as Easy Read or video.
We will introduce Contact Scotland BSL links to staff email signatures.	We engaged with the team at Contact Scotland BSL to understand their programme and how members of the public might be supported to use ESS' services. We then provided training on the programme and why it is important, and how to incorporate this into our staff's email signatures.	No further action planned.
We will support training as needed in Equality Impact Assessments (EqIA) and embed Equality Impact Assessment into our policy development and review process as relevant.	We have engaged with external experts to undertake an audit of our EqIA procedures, followed by delivery of an all-staff training session to build ESS' 'house' approach to EqIA.	We are currently working to incorporate recommendations from the audit and all-staff training to improve our procedures. Additionally, we are looking at how we further build these equality considerations into our operational procedures, ESS' outputs, and our governance arrangements.

4. Gender representation on our Board

4.1 As a Scottish public body, ESS is subject to the [Gender Representation on Public Boards \(Scotland\) Act 2018](#). This Act is intended to address the historic and persistent underrepresentation of women in public life.

4.2 This Act sets out the “gender representation objective” which aims for a public board to have 50% of non-executive members who are women. Public boards should have achieved this objective by 31 December 2022.

4.3 At ESS, we have continuously achieved the gender representation objective since the December 2022 deadline:

	Women	Men	Total	Gender representation objective achieved? ³
At 31 December 2022 deadline	Two	Three	Five	Yes
At 28 April 2023	Three	Four	Seven	Yes
At 30 April 2025	Three	Three	Six	Yes

4.4 Since April 2023, there have been changes to ESS’ Board membership. Our first Chair, Jim Martin, stepped down in March 2024. The Scottish Government carried out the recruitment process for a new, permanent Chair over the course of 2024.

4.5 The ESS and Scottish Government Public Appointment teams promoted the post across a broad spectrum of organisations and networks, including platforms with a diversity focus and a number of gender-specific organisations, to encourage applications from women.

4.6 This appointment is due to be confirmed in May 2025.

³ As per section 1(2) of the [Gender Representation on Public Boards \(Scotland\) Act 2018](#), where our Board comprised an odd number of members, the 50% figure applies as if our Board has one fewer member

5. Next steps

5.1 The tables in section 3 set out the next steps for our current equality outcome action plan. By 2027, we will hope to have met these three outcomes, and will have embedded ways of working that will ensure these achievements are sustained.

5.2 Between now and the next reporting deadline, we will also have implemented our new Strategy 2026-31, refreshed our Communication and Engagement Plan, developed our organisational culture and, subsequently, reviewed our People Strategy. As part of the Strategy development process we will consult publicly, and will aim to gather feedback as widely as possible, reaching out to communities and networks across Scotland.

5.3 With a new Strategy and refreshed operational procedures in place, we will be well placed to develop our next set of equality outcomes for 2027-31.



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