



HISTORIC
ENVIRONMENT
SCOTLAND

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EACHDRAIDHEIL
ALBA

SECTION ONE: ESSENTIAL INFORMATION

Directorate and Service :	Heritage			Name of Lead Officer:	Philip Robertson			
				Team:	Designations			
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Proposal/Project:	Long-term strategy for heritage designation in Scotland				Reference No. (if applicable):			
What is the Proposal?	Budget or Other significant Financial Decision		Corporate Policy/Plan (New or Change)		New or Changed HR Policy & Practice		New or Changed Service Delivery / Service Design	
	No		No		No		Yes	
Who Does the Proposal Affect?	Stakeholders	Partners	Members of the Public	Employees	Other, please specify:			
	Yes	Yes	Yes	Yes				
The main aims of this proposal				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				<p>The strategy sets out a sustainable long-term approach for national-level heritage designations in Scotland.</p> <p>The draft strategy is intended to align with and contribute to wider sector and HES priorities and strategies set out in Our Past Our Future, the HES Corporate Plan 'Heritage for All (2025-28)', and HES Equalities Outcomes Report 2025-29.</p>				

<p>and land use decisions to maintenance of historic properties, and investigation of archaeological sites.</p> <p>The strategy proposes a vision for what success will look like for designations in 2035:</p> <p>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 deliver better heritage outcomes and wider community benefits.</p> <p>This vision is underpinned by a mission which explains our purpose.</p> <p>HES leads on identifying, protecting, and providing information about Scotland's most significant historic places. Our work supports well-informed decisions by communities, partners and others across Scotland, ensuring our historic environment is well-managed for current and future generations.</p> <p>To work towards the vision, and to deliver the mission, the strategy also sets out priorities for the HES corporate plan period 2025-2028.</p>	<p>The strategy will guide how HES administers its designation function, for example how we prioritise our work, how we handle external requests, and how the public can engage with decision-making on designations.</p>
<p>Objective 1: Looking ahead - HES will lead a collaborative and inclusive conversation to develop and publish long-term (10-year) priorities for heritage protection by March 2028.</p>	<ul style="list-style-type: none"> • Stakeholder feedback shows limited interest in major legislative changes but supports a more strategic and proactive HES. We aim to establish a clearer and more forward-looking focus by working with others to review our collective approach and explore alternatives, to set priorities, and to examine our principles through research and inclusive engagement. • 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.
Objective 2: 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.	<ul style="list-style-type: none"> • 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 benchmarking our records,¹ 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 3: Improving our service - redesign our public offering to deliver timely decisions, publishing details of a revised approach in 2025/26.	<ul style="list-style-type: none"> • 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 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 4: Understanding our impact - by March 2027, capture baseline evidence and communicate insights into the impacts of the current systems of heritage protection.	<ul style="list-style-type: none"> • 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.

SECTION TWO: FINANCIAL INFORMATION – ONLY COMPLETE FOR BUDGET or OTHER SIGNIFICANT FINANCIAL DECISIONS

			COMMENTARY
Current spend on this Service (£'000s):	Total:	N/A	N/A
What is the dis-investment to this service budget (£'000s)	Per Annum:	N/A	N/A
What is the investment to this service budget (£'000s)	Per Annum:	N/A	N/A
Is this proposal a change to a charge or concession?	Dis-investment Total:	N/A	N/A
	Investment Total:	N/A	N/A
When will the saving/return on investment be achieved?	Start Date:	N/A	N/A
	End Date (if any):	N/A	N/A
Is this proposal a change to grant funding?	Dis-investment Total:	N/A	N/A
	Investment Total:		
Is this proposal a change to grant criteria?		N/A	N/A

SECTION THREE: EVIDENCE Please include any evidence or relevant information that has influenced the decisions contained in this EqIA.
(This could include demographic profiles; social/household audits; research; national guidance or legislative requirements and how this relates to the protected characteristic groups)

A - Quantitative Evidence: This is evidence which is numerical and should include the number people who use the provision and the number of people from the protected characteristic groups who might be affected by changes to the service.

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. While 2022 census data (<https://www.scotlandscensus.gov.uk/2022-results/>) and cultural engagement statistics exist (e.g. [Scottish Household Survey \(2020: Culture and Heritage Report\)](#)), they 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 very 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.

The draft 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 largely 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 very small, but if the figures are extrapolated, 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 (2022 census figures).

B - Qualitative Evidence: This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.	
Social - case studies; personal /group feedback / consultation / research /other:	
<p>The draft strategy and this EQIA has been shaped by the findings of a strategic review HES undertook in 2024. 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]. These groups were targeted 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.</p> <p>During preparation of this draft EQIA, we have 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.</p>	
Best Judgement:	
Has best judgement been used in place of data / research / evidence?	Yes
Who provided the best judgement and what was this based on?	<p>HES designations service with input from the HES Equalities Team, based on the findings of the review.</p> <p>The draft strategy is a product of extensive pre-consultation engagement with groups and individuals in the heritage and planning sector and beyond. We have also engaged with staff across HES including equalities colleagues.</p>
What gaps in data / information were identified?	We lack 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.
Is further research necessary?	No

If NO, please state why.	As this stage of development and drafting is complete, no further research is required. The strategy will be finalised post-consultation. Delivery of the strategy may involve research and analysis into equalities-related issues, both to gather evidence, and to report successfully on progress against objectives.
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SECTION FOUR: ENGAGEMENT/CONSULTATION

With individuals or organisations affected by the policy or proposal

Has the proposal / policy / project been the subject of relevant engagement/consultation?	Yes Pre-consultation engagement, with more planned during a public consultation.
If YES, please state who was engaged/consulted.	<p><u>2024 – pre-consultation engagement on behalf of HES by MainStreet Consultants during the designations review:</u></p> <p>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 (PARC); 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; Scotlands 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;</p>

		<p>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.</p> <p>The strategy's vision, mission and priorities have all been developed from this engagement and will be refined after consultation.</p> <p><u>Public consultation</u></p> <p>During a public consultation on the draft strategy, we intend to invite views from and to engage directly with equality groups across Scotland to provide an opportunity for under-represented sections of society to engage with our plan and to foster good relations. We will make sure the consultation is available in a variety of formats, including Easy Read. The consultation will specifically ask about impacts on people with protected characteristics. The final strategy and EQIA will take on board the findings of the consultation.</p>
If NO engagement/consultation has been conducted, please state why.		N/A
How was the engagement/consultation carried out?		What were the results? Please highlight and embed any consultation report/s.
Focus Group	Yes	Pre-consultation evidence-gathering and engagement involved stakeholders from the planning and heritage sector based on their detailed knowledge of the system. We will keep the need for further focus-group discussion during the formal public consultation under review.
Survey	Yes	We intend to invite views from the public to our draft strategy through an online survey. We will be writing out to equalities groups to inform them of the consultation and to invite their views, both on the strategy itself, and any impacts on protected characteristic groups.
Display / Exhibitions	No	
User Panels	No	

Public Event	Yes	During the evidence gathering-phase we organised meetings with specific heritage/planning stakeholder groups. During the public consultation on our draft strategy, we intend to organise an external equalities event(s) to provide an opportunity for under-represented sections of society to engage with our plan and to foster good relations.
Other: please specify		
Has the proposal / policy / project been reviewed / changed as a result of the engagement/consultation?	Yes / No - To be finalised post consultation	
Have the results been fed back?	Yes / No - To be finalised post consultation	
Is further engagement/consultation recommended?	Yes / No - To be finalised post consultation	

SECTION FIVE: PARTNERS / OTHER STAKEHOLDERS

Which sectors are likely to have an interest in or be affected by the proposal / policy / project?		Describe the interest / affect.
Business	Yes	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 are considering any impacts through a separate Business Regulatory Impact assessment process and will be asking for feedback on this at consultation.
Local Councils/Community Planning Partners	Yes	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. Local authorities' input has been sought throughout the engagement and consultation process and their responses have contributed to the development of the strategy and further input will be invited at public consultation.

Wider Heritage/Conservation/Tourism Sectors	Yes	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. Comments at public consultation will shape the final strategy.
Voluntary / Other Sectors	Yes	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 further comment will be invited at consultation.
Other(s): please list and describe the nature of the relationship / impact.	Owners and occupiers of designated sites and places may be interested and affected by the strategy. We will be seeking input from owners at public consultation through representative bodies.	

SECTION SIX: ASSESSMENT OUTCOME

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	Yes	We will revisit this depending on the findings of the consultation.
The proposal has to be adjusted to reduce impact on protected characteristic groups		
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups		
Stop the proposal as this is potentially in breach of equality legislation		

SECTION SEVEN: ACTION PLANNING

Mitigating Actions: 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.

Identified Impact	To Whom	Recommendation to address the issues raised	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Equality Outcomes
Advancing equality of opportunity to participate in the designation process.	All under-represented groups with protected characteristics	<ul style="list-style-type: none"> To ensure that this opportunity is taken through engagement using a wide variety of formats as appropriate To develop a system to measure impact on equality groups. 	Dara Parsons/Philip Robertson	Post consultation	Equality Outcomes: 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.	<ul style="list-style-type: none"> HES All groups with protected characteristics 	<ul style="list-style-type: none"> All related projects should undergo EQIA screening. 	Dara Parsons/Philip Robertson	Post consultation	Equality Outcomes: 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.	People who haven't been involved in the designation process before	<ul style="list-style-type: none"> To ensure we are reaching out directly to community groups as appropriate. 	Dara Parsons/Philip Robertson	Post consultation	Equality Outcomes: 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.	People who face barriers to technology (e.g socio-economic background; disability; and age).	<ul style="list-style-type: none"> Mitigation through the strategy by adhering to public sector accessibility standards. Developing a system to monitor impacts through change, for example people who used to use a system before. 	Dara Parsons/Philip Robertson	Post consultation	Equality Outcomes: Our Services (We work to remove barriers to access, creating meaningful engagement opportunities for everyone regardless of who they are.)

Risk of indirect exclusion through prioritisation of external requests	Could cover a range of potential groups depending on how prioritisation works.	<ul style="list-style-type: none"> We will be asking questions through our consultation to gauge views on approaches to prioritisation, and there will be an opportunity for people to provide feedback on impacts to protected characteristics. Regular reviews as the prioritisation process develops in accordance with our Equalities Duties. 	Dara Parsons/Philip Robertson	Post consultation	Equality Outcomes: Our Services (We work to remove barriers to access, creating meaningful engagement opportunities for everyone regardless of who they are.)
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No Mitigating Actions

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

Are actions being reported to SMT? If yes when and how?	Yes / No	Date Reported to SMT:		

SECTION EIGHT: LEAD OFFICER SIGN OFF

Lead Officer:			
Signature:	Philip Robertson (Deputy Head of Designations)	Date:	24/4/2025

SECTION NINE: HEAD OF SERVICE/DIRECTORATE SIGN OFF

Director / Head of Service/Directorate :			
Signature:		Date:	