

Equality Impact Assessment and Fairer Scotland Duty Assessment

**A consultation document for the Scottish
National Adaptation Plan 2024 - 2029**

January 2024

Section 1: Details of the policy/practice/project

Department/Team responsible:	Scottish Government/Climate Adaptation Team		
Name of Policy, Practice or Project being assessed	The draft Scottish National Adaptation Plan (2024-2029) ¹		
Purpose and anticipated outcomes	<p>The Climate Change (Scotland) Act 2009 requires the preparation of a strategic programme for climate adaptation, as soon as reasonably practicable after each round of the UK Climate Change Risk Assessment (UK CCRA), the evidence for which is prepared by the independent UK Climate Change Committee (CCC). The proposed Plan will respond to the risks set out in the UK Climate Change Risk Assessment 2022.</p> <p>Outcomes:</p> <ol style="list-style-type: none"> 1. Nature connects across our land, settlements, coasts and seas. 2. Communities are creating climate-resilient, healthy and equitable places. 3. Public services are collaborating in effective, inclusive adaptation action. 4. Economies and industries are adapting and realising opportunities in Scotland's Just Transition. 5. Scotland's international role supports climate justice and enhanced global action on climate adaptation. 		
Is this a new or existing policy, practice or project?	New	√	Existing
Is this proposal/decision strategically important or not?	Yes	√	No
List of participants in Equality Impact Assessment Process	Rannoch Graham Kay White Iain Thom Sarah Chalmers Ian Freeman		
Date Assessment started:	17/07/2023	Completion Date	Draft EqIA completed 12/01/2024
Please indicate who is likely to be affected:	<p>The impacts of climate change are indiscriminate and will likely leave no person untouched over the coming years. However, the extent to which individuals and communities living in climate-impact-prone areas are adversely affected by</p> <p>For example: Employees, visitors, contractors, women, men, young people, older</p>		

¹ The draft Scottish National Adaptation Plan will be referenced as 'the Plan' throughout for brevity.

people, people with disabilities etc.

climate impacts depends on their vulnerability .

Vulnerability has three elements:

- Exposure to climate impacts
- Adaptive capacity
- Sensitivity to climate impacts:

People living in social and economic disadvantage are more likely to experience poor-quality environments, less likely to have the adaptive capacity, more likely to be sensitive to the impacts of climate change. Other factors affecting vulnerability include geographic location and housing tenure and energy efficiency.

Climate change and these social, economic and personal factors act together as risk multipliers to increase the impacts on health and health inequalities.

Section 2: Collecting information

What evidence is available about the needs of relevant groups? Please consider demographic data, including census information, research, consultation and survey reports, feedback and complaints, case law, others knowledge and experience.

Details	Source of Evidence
<p>Demographic information on the population of Scotland:</p> <p>2022 Census Age - 65 and over: 20.1% Age - Under 15: 15.3% Sex: 51.4% female, 48.6% male</p> <p>2011 Census Race: BME 5.8% Long term health problem or disability: 20% Married or in a civil partnership: 45.4%</p> <p>Homelessness in Scotland 2022-23 Age – 25 to 49: 62% Race: BME 16% Disability: 51% have at least one additional support need</p>	<p>Scotland's Census 2022 - Rounded population estimates</p> <p>Scotland's Census results 2011</p> <p>Homelessness in Scotland: 2022-23</p>
<p>The risks and negative impacts of climate change that the plan will seek to address in a positive way are outlined below.</p> <p>Age</p> <ul style="list-style-type: none"> • There is sufficient evidence supporting the conclusion that older people are more at risk of heat-related mortality. <ul style="list-style-type: none"> ○ One study found a 2–5% increase in all-cause mortality in the elderly for every 1°C increase in the average daily outdoor temperature during the warm summer period, and a 1-2% increase 	<p>Technical report (CCRA3-IA) - UK Climate Risk</p> <ul style="list-style-type: none"> • Daily average temperature and mortality among the elderly: a meta-

in mortality for a 1 °C fall in temperature during cold periods. This was a meta-analysis looking at studies from around the world, but can also be applied to a temperate environment

- Another potential age group at increased risk from heat-related mortality is infants, with several studies finding an association between high temperatures and Sudden Infant Death Syndrome. This is not linked to climate change specifically, but if climate change increases temperature then it could increase the risk of SIDS, if all other factors are held constant.
- In the event of volatile weather, many older people – including those who are lonely, isolated, ill, living with dementia or reliant on medical equipment – need extra support to access supplies of food, warmth and medicine, and to rebuild damaged homes and possessions.
- Furthermore, older people are less likely to perceive climate change as an urgent problem. This risk perception is linked to lower levels of flooding preparedness in communities. In 2019, adults aged 75 and over in the UK were the least likely to state that they believed climate change to be an immediate and urgent problem, compared to other age groups..
- Younger and older people (age 16-29 and 60+) are more likely to use the bus and less likely to use privately owned cars which means that they may be more affected by disruptions to the public transport system.
- In 2017/2018, the vast majority of social at home clients (77%) were aged 65 years old and over. Due to their increased representation in this group of people, disruption to home social care services may be more likely to affect this age group.

[analysis and systematic review of epidemiological evidence](#)

[Hyperthermia and Heat Stress as Risk Factors for Sudden Infant Death Syndrome: A Narrative Review](#)

[Older people and power loss, floods and storms: Reducing risk, building resilience - Age UK](#)

[Social vulnerability to floods: Review of case studies and implications for measurement - ScienceDirect](#)
[Scottish Household Survey 2019](#)

[Transport and Travel in Scotland 2019: Results from the Scottish Household Survey](#)

[Social Care Services Scotland 2017](#)

<ul style="list-style-type: none"> • In 2017/2018, the vast majority of long stay care home residents (91%) were aged 65 years old and over. Due to their increased representation in this group of people, disruption to social care provided in long stay care homes may be more likely to affect this age group. 	Care home census for adults in Scotland: Statistics for 2009 to 2019
<p>Disability</p> <ul style="list-style-type: none"> • There is strong evidence that people with pre-existing conditions are more at risk of heat-related mortality. • Pre-existing health conditions are recognised as factors that increase the risk of adverse outcomes from flood events. • Adults with a long-term illness or disability are less likely to view climate change as an immediate and urgent problem than those without This risk perception is linked to lower levels of flooding preparedness in communities. • Adverse weather, made more likely by climate change, will cause disruption to local, national and international supply chains. Resilience may be decreased for some members of this protected group reliant on prescriptions and global and national medical supply chains • Disabled adults are slightly more likely to use the bus than those who are not disabled meaning that they may be more affected by- climate-related disruptions to the bus system. Disabled adults were less likely to use the train. Disabled adults may also face barriers in using modes of active travel such as walking and cycling. • Households with a disabled person are substantially more likely to experience food insecurity than those without. One of the contributing factors to this is physical access to food; in the event of disruption to food 	Technical report (CCRA3-IA) - UK Climate Risk Third UK Climate Change Risk Assessment (CCRA3): Future flood risk - Sayers and Partners Social vulnerability to floods: Review of case studies and implications for measurement - ScienceDirect Sustainable Supply Chain Risk Management in a Climate-Changed World: Review of Extant Literature, Trend Analysis, and Guiding Framework for Future Research Transport and Travel in Scotland 2019: Results from the Scottish Household Survey Food insecurity and inequalities experienced by disabled people - The Food Foundation

<p>supply chains due to climate change impacts this may increase (e.g. increased difficulty in travelling to different locations due to mobility issues).</p> <ul style="list-style-type: none"> • 53.6% of households with at least one member with a disability or long-standing illness that also require accessibility adaptations to make it easier for all householders to go about their daily activities have self-reported requiring one or more additional accessibility adaptations which they do not already have (equating to around 80,000 households). This need for accessibility adaptations may overlap or conflict with households receiving or requiring climate resilient adaptation measures. • People with disabilities or pre-existing health conditions have been identified as being more likely to be at risk of energy poverty. People in these groups are likely to have greater 'energy needs'. These can include a requirement to heat the home for longer hours and at a higher temperature to maintain comfort, and an increased dependence on electricity to power medical equipment or other devices crucial to their well-being. These increased needs can both lead to greater energy costs and increased vulnerability to interruptions to power supply. Increased financial vulnerability as a result of high fuel costs can also impact on households ability to meet the financial costs of other adaptation measures. • In 2017, 33% of home-care clients had physical disabilities. This higher need for social care in the home presents a higher risk for disabled people in the event of climate-related disruption to social care. 	<p>Enhancing the accessibility, adaptability and usability of Scotland's homes - Scottish Government</p> <p>Social Care Services Scotland 2017</p> <p>Identifying double energy vulnerability: A systematic and narrative review of groups at-risk of energy and transport poverty in the global north – ScienceDirect</p> <p>Health, Disability and the Energy Crisis (HTML) Consumer Scotland</p>
<p>Gender Reassignment</p> <ul style="list-style-type: none"> • In 2013, the Scottish Government Equality Outcome Evidence Review, noting severe limitations in data size, highlighted evidence demonstrating that transgender people were more likely to be living on lower incomes which is a risk factor for potentially being more vulnerable to the harmful 	<p>Scottish Government Equality Outcomes: Lesbian, Gay, Bisexual and Transgender (LGBT) Evidence Review</p>

<p>impacts of climate change. It is recommended this intersectional risk be further explored as part of the Fairer Scotland Duty Impact Assessment due to the data limitations on this protected characteristic.</p>	
<p>Marriage and Civil Partnership</p> <p><i>In respect of this protected characteristic, a body subject to the Public Sector Equality Duty (which includes Scottish Government) only needs to comply with the first need of the duty (to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010) and only in relation to work. This is because the parts of the Act covering services and public functions, premises, education etc. do not apply to that protected characteristic. Equality impact assessment within the Scottish Government does not require assessment against the protected characteristic of Marriage and Civil Partnership unless the policy or practice relates to work, for example HR policies and practices.</i></p>	
<p>Pregnancy</p> <ul style="list-style-type: none"> • There is evidence that temperature extremes adversely impact birth outcomes, including, but not limited to: changes in length of gestation, birth weight, stillbirth, and neonatal stress in unusually hot temperature exposures. No research specific to Scotland was found. • Exposure to green space during pregnancy has been associated with (a) improved foetal growth and reduced risk and (b) reduced risk of pregnancy complications such as pregnancy-induced hypertensive disorders. No research specific to Scotland was found. • Disruption to the availability or access to certain foods or nutrition during pregnancy may increase the occurrence of inadequate maternal nutrition. Poor maternal and child health outcomes, particularly poor birth outcomes, are linked to inadequate maternal nutrition during conception, during pregnancy and after delivery. • Households with a baby under one are also at higher risk of poverty. A third, 34%, of children in households with a child under one were in relative poverty in 2018-21. This compares to 24% of children overall. 	<p>Heat Exposure and Maternal Health in the Face of Climate Change</p> <p>(a) Green space, health inequality and pregnancy</p> <p>(b) The Effect of Park and Urban Environments on Coronary Artery Disease Patients: A Randomized Trial</p> <p>Effectiveness of nutritional supplementation during the first 1000-days of life to reduce child undernutrition: A cluster randomized controlled trial in Pakistan</p> <p>Tackling child poverty delivery plan: fourth year progress report 2021-2022 - focus</p>

<p>Households living on lower incomes are at higher risk of being more vulnerable to the effects of climate change.</p>	<p>report on households with babies under one - gov.scot (www.gov.scot)</p>
<p>Race</p> <ul style="list-style-type: none"> • On average, minority ethnic workers in Scotland earn less than white workers. Conversely, low-income groups often include a disproportionate number of people from ethnic minority communities which is a risk factor for potentially being more vulnerable to the harmful impacts of climate change. This intersectional risk should be further explored as part of the Fairer Scotland Duty Impact Assessment. • The most socially vulnerable of all ethnicities experience systemic flood disadvantage (experiencing risk that is greater than the average), with Black, African and Caribbean Ethnic Groups particularly disadvantaged. Flood disadvantage exists across all ethnicities, but Black and Other Minority Ethnic Groups are more likely to have a lower income and more likely to live in rented accommodation. These two factors lead to significantly lower levels of flood insurance and higher levels of disadvantage. • In terms of the make-up of the future economy and how this might impact/be impacted by climate change, it is important that growth sectors are as diverse and flexible as possible. 'Environment professionals', 'Environment and conservation associate professionals', 'Fishing and other elementary agriculture occupations n.e.c', and 'Environmental health professionals' are among the bottom 12 of the least racially diverse professions in the UK, with just 4.81% identifying as Black, Asian or from other minority ethnic groups compared to 12.64% across all UK professions. No research specific to Scotland professions was found. • Increased ethnic/cultural diversity has been shown to lead to greater profitability and reduced economic loss in the private sector. Encouraging 	<p>Ethnicity pay gaps, UK: 2012 to 2022 - ONS</p> <p>Present and future flood vulnerability, risk and disadvantage: A UK Assessment - Sayers and Partners</p> <p>Racial Diversity in Environment Professions: 2022 - Students Organising for Sustainability</p> <p>Anti-racist employment strategy - A Fairer Scotland for All - Scottish Government</p>

<p>an increase in ethnic/cultural diversity in Climate Smart Workforce professions could potentially maximise economic benefits of the Plan.</p> <ul style="list-style-type: none"> Increasing the diversity of the Heat Network sector (an important component of a future Climate Smart Workforce) was found to be important for increasing the pool of talent available to employers and meeting future recruitment needs. It is also important for distributing the opportunities associated with climate adaptation more equally and ensuring a just transition. No research specific to Scotland was found. 	<p>Heat network skills review (2020) - BEIS</p>
<p>Religion or belief</p> <ul style="list-style-type: none"> It has been theorised that impacts on food supply chains may be felt more harshly by those who require access to specific food types as part of their religious diet. However, no specific research has been identified to support this. 	
<p>Sex</p> <ul style="list-style-type: none"> The gender pay gap for all employees in Scotland is 8.7 per cent. This implies that women are more likely to be living on lower income which is a risk factor for potentially being more vulnerable to the harmful impacts of climate change. This intersectional risk should be further explored as part of the Fairer Scotland Duty Impact Assessment. There is evidence that women have different transport needs to men. Women are more likely to be the primary care givers in their families, and to be single parents. These caring responsibilities require women to make multiple short journeys in a day and they are reliant on resilient, reliable transport to make these journeys. Unreliable public transport can substantially reduce women’s access to paid employment, education, retail options, social activities as well as essential services such as welfare services, hospitals and GP surgeries (both for themselves and those they care for). This is particularly the case for women from lower income families, who are more likely to use public transport, and especially buses, compared to higher income households. 	<p>Annual Survey of Hours and Earnings (ASHE) 2023</p> <p>Supporting documents - Tackling child poverty delivery plan 2022-2026 - annex 6: what works - evidence review - gov.scot (www.gov.scot)</p> <p>Transport-in-a-Gender-Equal-Economy.pdf (wbg.org.uk)</p> <p>Transport and inequality (publishing.service.gov.uk)</p>

<ul style="list-style-type: none"> • There is some evidence to suggest female farmers are more likely to see the business benefits of environmentally sustainable farming practices. • In 2017, women were very under-represented amongst the elected leadership of national-level farming organisations. The cultural practice of passing on large farms intact to one son was the single biggest barrier to women’s entry into agriculture. 20% of women reported that they had no role in both day-to-day decision-making and major decisions on their farms. Some 53% would have liked a bigger role in decision making. Female farmer’s daily lives are very busy often juggling farm work, child care, domestic roles and off farm employment. This research found the continued domestic and child care responsibilities are often not equally shared with their male spouses. • The Scottish Agricultural Census 2021 shows that 40% of all working occupiers and spouses on Scottish Farms are female, and 60% are male. 	<p>From risks to rewards: overcoming the impacts of climate change on women in agricultural supply chains</p> <p>Women in farming and the agriculture sector: research report 2017</p> <p>Women in Agriculture research: progress report - 2020-2021</p>
<p>Sexual orientation</p> <ul style="list-style-type: none"> • Gay men are somewhat more likely to experience poverty than heterosexual men which is a risk factor for potentially being more vulnerable to the harmful impacts of climate change. This intersectional risk should be further explored as part of the Fairer Scotland Duty Impact Assessment. 	<p>An Examination of Poverty and Sexual Orientation in the UK</p>
<p>Socio-economic disadvantage (As part of the Fairer Scotland Duty Assessment)</p> <ul style="list-style-type: none"> • Evidence highlights that people who live in poorly constructed homes in ‘urban heat islands’, are on low incomes and who are disconnected from social networks are more likely to be vulnerable to high temperatures. Any large scale increase in future reliance on mechanical cooling would potentially increase the inequality in heat risks (as currently seen in the US). Low income households may be unable to afford retrofitting 	<p>Climate change and social justice: an evidence review Joseph Rowntree Foundation (jrf.org.uk)</p> <p>Assessing population vulnerability towards summer energy poverty: Case studies of Madrid and London</p>

measures, or installation and maintenance costs associated with space cooling measures to reduce heat exposure.

- A review of access to green space by Public Health England found that people from lower income households access green space less and live in less green neighbourhoods compared to wealthier groups.
- For private water supply owners, the issues around water quality (such as E.coli contamination) often occur more regularly and can be of more immediate concern to users than the risk of water scarcity from climate change impacts such as heavy rain or drought. Many private water supply owners do not engage with local authorities, due to the fear that they will identify costly repairs and upgrades or issue enforcement notices if the repairs are not carried out. Low-income private water supply owners are more likely to fear unexpected costs they cannot meet with regards to water treatment and therefore are the least likely to engage with their local authority for support and advice. The uncertainty around the total cost of connecting to mains water can make the possibility of connection prohibitive for many private supply communities.
- 9% of adults in Scotland in 2021 experienced food insecurity in the previous 12 months. For those already living in food insecurity and with inadequate nutrition, the risks of a changing climate and increasing numbers of climate shocks impacting the global food supply chain system, it is reasonable to predict possible food shortages or food price spikes which may exacerbate these issues. If future climate-related food shocks occur, it is likely that low-income families will be the most affected.
- One of the main social factors affecting vulnerability to flooding is related to people's financial situation. People on low incomes living in areas exposed to flooding may not be able to afford property level protection (PLP) measures (Bichard and Kazmierczak, 2012). They are also less

[Improving access to greenspace: A new review for 2020](#)

[Private Water Supplies: A framework to deliver universal access to safe and affordable drinking water for all - Citizens Advice Scotland](#)

[The Scottish Health Survey 2021 - volume 1: main report](#)

[Mapping Flood Disadvantage in Scotland 2015: Main Report - Scottish Government](#)

likely to have home contents insurance (Tapsell et al., 2002). They can be further economically vulnerable to the impacts of flooding due to lower financial reserves or access to credit to replace lost possessions or make necessary repairs as well as to pay for temporary housing and the increased transport costs associated with relocation of evacuation. Evidence recommends that post-flood adaptation responses for vulnerable people should take into consideration the increased likelihood of repeat flooding in the long term and the likely slower recovery time of financially vulnerable people. Also, lower skilled workers and those not in work were found to have lower awareness of being exposed to flooding than those in higher socio-economic groups (Fielding, 2012). Poverty rates tend to be higher among renters than homeowners, with tenants in social housing tending to belong to the lowest income groups (McInness, 2013). Tenants tend to have fewer resources to invest in PLP measures and either require the permission of property owners and/or building managers to implement them. They may also be reluctant to fully or partly contribute to costs or to suffer the associated disruption of implementing flood resistance or resilience measures when they are living in a property that does not belong to them (ClimateJust, 2015). The 2007 Scottish Household Survey found that 56% of local authority tenants and 50% of housing association, cooperative or private tenants had contents insurance, compared to 98% of owner-occupiers with a mortgage (Hayton et al., 2007). Buildings insurance is usually the responsibility of the owner, thus tenants are reliant on their landlord to ensure they live in a building which is appropriately insured (ClimateJust, 2015). As it is the occupiers who may bear most of the cost of flood damage, landlords are less motivated to invest in property-level resilience measures (ASC, 2011). Finally, private tenants may have less local knowledge as they tend to have shorter length of residence in an area compared to owner occupiers (DCLG, 2013). People living in areas with a high turnover of population may be less aware of the likelihood of being affected by floods, how to respond and where to seek support. They may also lack social

[Climate change and social justice: an evidence review | Joseph Rowntree Foundation \(jrf.org.uk\)](#)

connections to friends and neighbours in the local community (Zsamboky et al., 2011) who can improve knowledge of the local area and provide social support and a response network (Lindley et al., 2011). As a result, those without family and friends within their local area, especially the lower income groups, are the most likely to need to use public shelters in the event of, for example, a flood-related evacuation (Scawthorn et al., 2006). Conversely, where social networks are relatively well-established there is evidence of a better response to emergency situations and quicker recovery (Preston et al., 2014). Having access to a car, rather than relying on public transport and the general good connectivity of the area by roads, influences people's ability to respond to flood events quickly.

From your research above have you identified any gaps in evidence? If so, what are the gaps?

Currently, there is a lack of research available regarding the impact of climate change upon certain protected characteristics and their ability to adapt to the impacts of climate change (religion or belief, sexual orientation and or gender reassignment). As such we are unable to ascertain any clear-cut impacts on these protected characteristics, only theoretical impacts.

There is a lack of detailed or robust research that is specific to Scotland available regarding the impact of climate change upon certain protected characteristics and their ability to adapt to the impacts of climate change (age, disability, pregnancy, race and or sex). As such we are only able to assess any impacts on these protected characteristics in relation to the wider UK basis or using international samples, which should be incorporated when analysing the strength of the evidence base.

As appropriate please describe the consultation/engagement undertaken including details of the groups involved and the methods used:

This EqIA and FSDA has been based on an assessment of evidence, the expertise of the Climate Adaptation team and an internal consultation of the Scottish Government's expert policy advisors relevant to each significant policy undertaking in the Plan.

Are there any other groups to be consulted?

In order to elicit wider views on the potential impact of the Plan on the aforementioned protected characteristics groups and those with socio-economic disadvantage, we have included two specific questions relation to this partial EqIA and FSDA in the public consultation document:

Personal characteristics that are protected by law against discrimination are: age; disability, gender reassignment; marriage and civil partnership; pregnancy, religion or belief, sex and sexual orientation.

26. What, if any, impacts do you think this Adaptation Plan will have on groups/individuals who share the aforementioned protected characteristics?

27. What, if any, measures could be taken to strengthen any positive impacts or lessen any negative impacts in this respect?

Lower-income households are already at increased risk from the impacts of climate change. Measures to increase climate resilience should aim to reduce the social and economic disadvantages experienced in Scotland.

28. What, if any, impact do you think this Plan will have on inequality caused by socio-economic disadvantage?

29. What, if any, measures could be taken to strengthen any positive impacts or lessen any negative impacts in this respect?

During the formal consultation period we also intend to consult with a range of groups directly regarding the strategy and equality/inequality, including:

- Requesting specific comment on the Plan from the Climate Policy Engagement Network, an Open Government stakeholder network designed to deliver expert advice to support and deliver engagement on key climate change policy providing a platform for key underrepresented population groups.

Following the formal consultation, additional views gathered will be reflected in the final EQIA and FSDA published alongside the final version of SNAP3 which is expected in September 2024.

Section 3: Assessing the impacts and identifying opportunities to promote equality

EqIA: Having considered the data and evidence we have gathered to date, this section requires us to consider the potential impacts – negative and positive – that our policy might have on each of the protected characteristics. It is important to remember the duty is also a positive one – that we must explore whether the policy offers the opportunity to promote equality and/or foster good relations.

The following protected characteristics have been scoped out of this EqIA as after considering the data gathered in Section 2, they are not considered to be exclusively affected by the Plan and are taken into consideration in the context of the other protected characteristic categories:

- Gender reassignment
- Sexual orientation
- Religion or belief
- Marriage and Civil Partnership

The following protected characteristics remain for assessment:

- Age
- Disability
- Pregnancy and Maternity
- Race
- Sex
- Socio-economic status
- Cross-cutting impacts

Do you think that the plan impacts on people because of their age?

Age	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	<u>None</u> : There is no evidence to suggest that, overall, the Plan would have an adverse impact because of a person's age in this respect.

Advancing equality of opportunity	X	X		<p><u>Positive:</u> The Plan makes provision for communities and individuals to be supported in taking locally led adaptation action. With strategic management, these provisions could allow for individuals and groups of different age groups to have opportunity to collaborate with each other to ensure a greater reflection of their specific needs and views in the integration process of climate resilience into wider community priorities.</p> <p><u>Positive:</u> The Plan makes provision to increase the resilience of supply chains. The very young will benefit from secured availability of specific foods and products in the event of extreme weather (i.e. infant formula, nappies).</p> <p><u>Positive:</u> The Plan makes provision for climate change adaptation for the transport system helping to maintain the reliability and resilience of public transport. This in turn will benefit children and young people especially where access to employment, education and training is maintained. This will also benefit older people with mobility issues who may have increased difficulty in travelling to different locations to secure food in the event of supply chain disruptions.</p> <p><u>Negative or neutral:</u></p> <p>While the Plan makes provision for increased awareness of property flood resilience measures and increased advice and support in relation to protection and recovery of extreme weather events, older people may have different needs and experience unique barriers in this respect. Further consideration should be given to older people's need for extra support to access supplies of food, warmth and medicine, and to</p>
-----------------------------------	---	---	--	--

				rebuild damaged homes and possessions in order to ensure equality of opportunity at the point of delivery.
Promoting good relations among and between different age groups	X			<u>Positive:</u> It is anticipated that the delivery of the Plan could have a positive impact on promoting good relations among different age groups, due to increased awareness and engagement of communities and individuals in ensuring the protection of those with social vulnerabilities to multiple risks.

Do you think that the policy impacts people with disabilities?

Disability	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	<u>None:</u> There is no evidence to suggest that the Plan would have an adverse impact on persons with disability in this respect.
Advancing equality of opportunity	X	X		<u>Positive:</u> The Plan makes provision for the increased awareness and development of the Ready Scotland platform as an accessible resource providing information and advice on emergency preparedness and response. The Plan makes provision for the Persons at Risk Distribution system which gives local authorities and the NHS the ability to identify vulnerable individuals including those with a disability during an emergency in order to offer additional support as needed. These measures in turn will reduce disadvantage by enabling people with disabilities to prepare and respond to extreme weather events. <u>Positive:</u> The Plan makes provision to increase the resilience of supply chains. This in turn will benefit people with a mobility disability who may have increased difficulty in travelling to different locations to obtain medicine or buy food in the event of supply

				<p>chain disruption as well as those who may require specific medicine or nutritional intake of certain foods due to their disability.</p> <p><u>Positive:</u> The Plan makes provision for climate change adaptation measures for the transport system helping to maintain the reliability and resilience of bus system. This will give continued independence to disabled users in the event of increased intense weather, allowing them to be outside the home participating in social activities including access to employment, ability to travel to see family and friends, ability to travel to medical appointments, and access to shops and public services.</p> <p><u>Positive:</u> The Plan makes provision for communities and individuals to be supported in taking locally led adaptation action. With strategic management, these provisions could allow for people with disabilities and disability groups to have opportunity to collaborate with other community groups in ensuring a greater reflection of their needs and views in the integration process of climate resilience into wider community priorities.</p> <p><u>Positive:</u> The Plan makes provision for Public Health Scotland to work with the Scottish Government and COSLA in supporting the social care sector to respond to the climate emergency. The Care Inspectorate (the scrutiny body regulation all social care services in Scotland) will share guidance on resilience to more extreme weather with providers through their information channels.</p> <p><u>Negative or neutral:</u> Although there is provision in the Plan for new and existing buildings to be designed or</p>
--	--	--	--	---

				retrofitted with adaptation measures, there is an absence of specific strategies to ensure the accessibility of climate adapted buildings. As Scotland's disabled population already face considerable housing challenges, it is important to consider that new or retrofitted adaptation properties do not reduce or remove the accessibility of homes. It is anticipated that planning regulation and building standard will ensure legal requirements are met in this regard.
Promoting good relations among and between disabled and non-disabled people	X			<u>Positive:</u> It is anticipated that the delivery of the Plan could have a positive impact on promoting good relations among and between disabled and non-disabled people, due to increased visibility and engagement of communities and individuals in ensuring the protection of those with social vulnerabilities to multiple risks.

Do you think that the policy impacts on pregnant people or parents?

Pregnancy and Maternity	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	<u>None:</u> We do not know of or anticipate any reason why the Plan would have any impacts on unlawful discrimination, harassment and victimisation in relation to pregnancy and maternity. It should be noted that there is limited evidence on pregnant people in regards to adaptation and official data on pregnancy and maternity is not recorded in the Census.
Advancing equality of opportunity	X			<u>Positive:</u> The Plan makes provisions for increased nature-based solutions including greenspace access which will likely have a positive impact on people who

				<p>are pregnant or postpartum in accessing the health benefits of nature.</p> <p><u>Positive:</u> The Plan makes provisions for health boards across Scotland to prepare and implement climate change adaptation plans which will in turn ensure continued access of service for people who are pregnant or postpartum in the event of extreme weather events.</p> <p><u>Positive:</u> The Plan makes provision to increase the resilience of supply chains. This in turn will benefit pregnant or postpartum people to secure food which meets their nutritional requirements.</p>
Promoting good relations	X			<p><u>Positive:</u> It is anticipated that the delivery of the Plan could have a positive impact on promoting good relations with regards to pregnancy or maternity. This is due to increased visibility and engagement of pregnancy and postpartum groups when bringing together communities and different groups to integrate climate resilience into wider community priorities. The positive impact of this will require strategic management to ensure the voices of the entire community are heard.</p>

Do you think the policy impacts on people on the grounds of their race?

Race	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			X	<p><u>None:</u> We do not know of or anticipate any reason why the Plan would have any impacts on unlawful discrimination, harassment and victimisation in relation to race. It should be noted that there is limited evidence on BME people in regards to adaptation measures.</p>

Advancing equality of opportunity	X	X		<p><u>Positive:</u> The Plan makes provision for affordable flood insurance to flood-prone households and businesses and increased awareness of property flood resilience measures will help to remove the some of the flood disadvantage currently experienced by BME households.</p> <p><u>Positive:</u> The Plan makes provision for communities and individuals to be supported in taking locally led adaptation action. With strategic management, these provisions could allow for BME individuals and groups to have opportunity to collaborate with other community groups in ensuring a greater reflection of their needs and views in the integration process of climate resilience into wider community priorities.</p> <p><u>Negative or neutral:</u> There is an absence of provisions in the Plan setting out recommendations for safeguarding the private rented sector in Scotland against the impacts of climate change which could help reduce BME flood disadvantage.</p> <p><u>Negative or neutral:</u> There is an absence of provisions in the Plan setting out specific strategies to facilitate the participation of BME individuals in the climate smart workforce. As there is a significant disparity in the number of BME individuals working within the environmental sector, this presents an opportunity to engage and research on the barriers to representation in this sector. Increased diversity in a climate-smart workforce will help contribute to the Plan’s innovation provision.</p>
Promoting good race relations	X			<p><u>Positive:</u> It is anticipated that the delivery of the Plan could have a positive impact on promoting good relations with regards to race. This is due to increased</p>

				visibility and engagement of ethnic minorities when bringing together communities and different groups of individuals together through place-based adaptation collaboration to ensure communities and individuals are supported to take locally-led adaptation action that meets their needs. The positive impact of this will require strategic management to ensure the voices of the entire community are heard.
--	--	--	--	---

Do you think that the policy impacts on men and women in different ways?

Sex	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation	X			<u>Positive:</u> The international outcome in the proposal notes that it will seek to amplify the voices of those communities most vulnerable to climate change which, in the international community, includes women. This along with the policy provisions contained within the outcome will help to ensure that women in communities in the Global South receive access to funding and resources that they have been historically barred from.
Advancing equality of opportunity	X	X		<u>Positive:</u> There are many provisions within the Plan committing to climate justice interventions for women through both partner funding, international advocacy, and research on Loss and Damage. For example, the Plan reaffirms an intention to become a commitment maker under the Feminist Action for Climate Justice theme through the UN Women’s Generation Equality Campaign. <u>Negative or neutral:</u> While there are provisions within the Plan to support developing skills in sustainable and regenerative agriculture, there is an absence of

				<p>provisions targeted at addressing the barriers faced by women in advancing their roles on the farm through these services. With strategic adjustment to ensure access to women with limited time or specific policies aimed at women, these opportunities could be equally accessible to both men and women. The Plan could look to suggest strategic climate adaptation policy recommendations for women in farming in Scotland if research indicates it is needed for a level playing field.</p> <p><u>Negative or neutral:</u> There is an absence of provisions (in the form of policy or research intentions) within the Plan for women living in Scotland. The lack of evidence to suggest the impacts of climate change adaptation measures on women in Scotland in particular could indicate further research may be required in this area to assess their disadvantage and whether further mitigation may be required.</p>
Promoting good relations between men and women	X			<p>Positive: It is anticipated that the delivery of the Plan could have a positive impact on promoting good relations with regards to sex. This is due to increased visibility and engagement of both genders when bringing together communities and different groups of individuals together through place-based adaptation collaboration to ensure communities and individuals are supported to take locally-led adaptation action that meets their needs including women's needs. The positive impact of this will require strategic management to ensure the voices of the entire community are heard.</p>

Do you think that the plan impacts on people because of their socio-economic disadvantage?

Fairer Scotland Duty Assessment	Response
<p>What are the main impacts of the proposal?</p>	<ul style="list-style-type: none"> • The Plan acknowledges the vulnerability of people living with social and economic disadvantage in experiencing poorer quality environments, having less adaptive capacity and increased sensitivity to the impacts of climate change. The policies contained within the Plan aim to tackle those with the highest level of vulnerability however where policies are applied equally across sections of the population, there is potential for socio-economic disadvantaged groups who require different levels of support or accommodations to have difficulty in accessing an equal level of adaptation as their peers. • The Plan makes provisions to give free advice and support on preparing for, responding to and recovering from extreme weather events which will help people with socio-economic disadvantage to navigate the impacts of climate change. • The Plan promotes the provision of affordable flood insurance for flood-prone households (for example through Flood Re) which will help reduce the flood disadvantage experienced by people with socio-economic disadvantage. Strategic management is required to ensure the uptake of insurance in light of the cost of living crisis having greater impact on those already struggling with socio-economic disadvantage. • The Plan makes provision for climate change adaptation for the transport system helping to maintain the reliability and resilience of public transport. This in turn will positively benefit socio-economically disadvantaged groups who do not have access to private transport especially where access to employment, education and training is maintained as well as ensuring the ability to travel to see family and friends, ability to travel to medical appointments, and access to shops and public services. • The Plan makes provision for exploring the vulnerability of private water supplies through the Water, Wastewater and Drainage policy public

	<p>consultation – further consideration of socio-economic disadvantage in relation to private water supplies may be required after analysis of consultation responses.</p> <ul style="list-style-type: none"> • The Plan makes provisions for increased nature-based solutions including greenspace access which will likely have a positive health benefits for people with socio-economic disadvantage. Strategic management will be required to ensure greenspace access remains equal to all regardless of socio-economic status. • The Plan makes provision to increase the resilience of supply chains which in turn decreases the likelihood of affordable food and essential supply shortages. This will reduce the impact faced by people with socio-economic disadvantage in the event of supply chain disruption who may not be able to afford more expensive alternatives.
<p>How could the proposal be improved so it reduces or further reduces inequalities of outcome?</p>	<ul style="list-style-type: none"> • The Plan or related measures could look to suggest climate adaptation policy recommendations for the social or private rental housing sectors. • The Plan or related measures could look to suggest strategic climate adaptation policy recommendations for women in farming in Scotland. • The Plan or related measures could look to suggest more ambitious ways of encouraging private investment funding to ensure public funding is dedicated to those who do not have alternative funding recourse.²

Do you think that the plan could create cross-cutting impacts?

The Scottish Government acknowledge that an individual or group of individuals may have two or more characteristics overlapping leading the policy to impact these people in a unique way not assessed above. The implementation of this plan could disproportionately impact specific demographics such as older people of ethnic minority backgrounds, pregnant people on lower-income or women with disabilities. In particular, the Plan acknowledges the multiplying impact of socio-economic factors and personal characteristics in regards to climate change impacts increasing health inequalities. Similarly recognising the number of different combinations of protected characteristics requiring further exploration in this regard, the Scottish Government recognise

² This approach is not preferred as it would depend on additional private sector investment which is out with the control of Scottish Ministers creating a delivery risk and is also subject to current economic pressures on many businesses already during the post-Covid recovery period.

that specific assessment of individual cross-cutting impacts with regards to the Plan is unlikely to produce clear feasible recommendations for policy mitigations to reduce inequalities beyond those suggested for individual factors.

Section 4: Decision making and monitoring

Identifying and establishing any required mitigating action

<p>Have positive or negative impacts been identified for any of the equality groups?</p>	<p>A range of potential positive impacts have been identified following the EqIA and FSDA. The draft outcomes in the Plan are intended to ensure everyone in Scotland is protected against the impacts of climate change without discrimination. However, certain outcomes are more likely to impact people than others. The community outcome in the plan in particular outlines putting people at the heart of place-based adaptation and with strategic management will allow for people with protected characteristics to take greater part in designing adaptation plans for their community. The realisation of these impacts will depend on strategic management of policy implementation.</p> <p>With proper delivery of the Plan's proposed outcomes, the anticipated impact on each of these outcomes is expected to be largely positive in relation to the protected characteristics where relevant evidence was available. Where limited data was available for some of the protected characteristics, options for future research will be explored.</p> <p>There may potentially be negative or neutral impacts on relations among and between certain socio-economic groups. The benefits of the plan may be more accessible to people with a higher disposable income leaving people experiencing socio-economic disadvantage with fewer opportunities to access the cross-cutting benefits of the intended outcomes. While there will be no unlawful discrimination or promotion of unequal opportunity in this regard, it is important that future opportunities to ensure equitable access of all socio-economic groups are further explored where available.</p> <p>Some protected groups may also feel the plan has a negative or neutral impact through the absence of provisions in certain policy areas:</p> <ul style="list-style-type: none">• Adaptation measures in the private or social rented sector• Adaptation for women in farming in Scotland
--	--

	<ul style="list-style-type: none"> • Diversity in a climate-smart workforce • Accessibility in climate resilient property designs • Targeted flooding guidance for older generations <p>Monitoring and evaluation of the Plan could include an equalities monitoring aspect to track the implementation of the strategy and unforeseen implications arising alongside planned mitigation measures. This will help to ensure the delivery of the Plan continues to eliminate discrimination, advance equality of opportunity and foster good relations. Consideration will be given to this prior to finalisation of the plan.</p>
Is the policy directly or indirectly discriminatory under the Equality Act 2020?	No. There is no evidence within this EqlA that the Plan is directly or indirectly discriminatory under the Equality Act 2010.
If the policy is indirectly discriminatory, how is it justified under the relevant legislation?	N/A
If not justified, what mitigation action will be undertaken?	N/A

Describing how Equality Impact analysis has shaped the policy making process

The equality analysis has helped to highlight areas where we do not have enough evidence on people with protected characteristics to make an informed decision on the effect of the policy on said group. The equality impact assessment analysis has also highlighted specific policy areas where further development and strategic management may be required to contribute to wider effort to ensure that current disadvantages are minimised.

The EqlA has also highlighted the importance of strategic management in place-based adaptation on a community level to ensure protected groups are engaged and involved in planning and implementation.

There have been no implications for costs or resources arising from the EqlA analysis.

Monitoring and Review

We are requesting the public through our consultation to gather or share further evidence and opinions for consideration on all protected characteristics. We welcome further feedback on enhancing our monitoring. Once this information has been received and analysed, we will feed it back into our assessment before development of the final Plan.

The consideration of equality impacts is an ongoing process that will require overseeing the implementation of many delivery arms to identify inequalities that still exist. By the time of the final Plan's publication, further additional Census 2022 data will have been published which will enhance the collection of equality data.

The delivery of the Plan will include monitoring and evaluation, and consideration is being given to whether this can include an inequalities monitoring aspect to track the implementation of the strategy and unforeseen implications arising alongside planned mitigation measures.

The Climate Change Act also requires the Climate Change Committee to prepare two reports within the lifetime of the Plan setting out its independent assessment of the progress made towards its objectives, proposals and policies. The first independent assessment of the previous programme included accompanying advice on ensuring adaptation programme was done in line with a just transition³ and it is hoped the CCC should continue to scrutinise the Plan's progress on ensuring fairness in its adaptation policies.

Additional specific policies proposed under the Plan should be screened for EqIAs, conducting them in full where assessed to be integral, to ensure human rights and equality impacts (both direct and indirect) have been fully considered.

Section 5: Authorisation of EqIA

Authorisation of the EqIA will take place once consultation responses have been gathered, analysed and considered in addition to the above before and during the development of the final Plan. The deputy director has given initial sign off on the draft EqIA and FSDA and the approach taken.

³ Defined as "Governments design policies in a way that ensures the benefits of climate change action are shared widely, while the costs do not unfairly burden those least able to pay, or whose livelihoods are directly or indirectly at risk as the economy shifts and changes".