



**Scotland's Census**

Shaping our future

A' dealbhadh ar n-àm ri teachd

**Scotland's Census 2022**  
**Human Rights**  
**Impact Assessment**  
**v5.0**

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## 1. Executive Summary

Scotland's Census 2022 is the official count of every person and household in Scotland. It is a unique survey in that it affects the whole of Scotland's population and there is a legal requirement to participate. This Human Rights Impact Assessment (HRIA) presents evidence on the potential impacts of the plans for Scotland's Census 2022 on the rights of individuals in Scotland.

Scotland is a diverse nation and stakeholders representing a range of interests have been fundamental to shaping Scotland's Census 2022. In preparing this assessment we have gathered evidence from a wide range of sources and reflected on our own and others' experience of previous censuses. In 2019 NRS held a series of stakeholder feedback sessions and conducted an online stakeholder survey to obtain feedback on the draft assessments. A report on the outcome of this period of consultation is published on the [Scotland's Census website](#).

This document is one of 8 impact assessments prepared for Scotland's Census 2022. Others include:

- Equality Impact Assessment
- Children's Rights and Wellbeing Impact Assessment
- Data Protection Impact Assessment
- Island Communities Impact Assessment
- Fairer Scotland Duty Impact Assessment
- Strategic Environmental Assessment
- Business Regulatory Impact Assessment.

Assessment of the impacts of Scotland's Census 2022 is an ongoing process which will continue up to census day on 20<sup>th</sup> March 2022 and beyond.

## 2. Background

### What is the census?

The census is the official count of every person and household in Scotland. It is usually held every 10 years and provides the most complete statistical picture of the nation available. It also provides information that central and local governments need, in order to develop policies and to plan, fund and run public services.

Scotland's Census is taken by the [National Records of Scotland](#) on behalf of the Registrar General for Scotland. The National Records of Scotland (NRS) is a non-ministerial department of the Scottish Administration, established on 1 April 2011, following the merger of the General Register Office for Scotland (GROS) and the National Archives of Scotland (NAS).

The main purpose of NRS is to collect, preserve and produce information about Scotland's people and history and make it available to inform current and future generations. It holds records of the census of the population of Scotland from 1841 and every 10 years after that. The one exception to date was the wartime year of 1941 when no census was taken. Census records are closed for 100 years under the Freedom of Information (Scotland) Act 2002.

## Scotland's Census moved to 2022

On 17 July 2020 the Scottish Government announced the decision to move Scotland's Census to 2022 following the impact of the COVID-19 pandemic.

The census collection is a huge logistical operation involving the recruitment and deployment of thousands of staff, including a large field force team who engage with the public on their doorstep. The 12 months leading up to a census are vital in planning and testing the effectiveness and safety and security of census systems and collection processes to ensure these are ready. COVID-19 restrictions during 2020 prevented these key activities from progressing. These impacts occurred in a number of areas, from progressing recruitment to being able to undertake comprehensive testing, from contacting care homes and hospitals to establish their requirements for questionnaires to engaging with third sector and community groups to encourage participation from everyone in Scotland.

The priority and responsibility of NRS is to put in place a census that enables everyone across Scotland to participate, so that information collected can be used to produce high quality outputs and deliver the benefits required by the people of Scotland. We had been monitoring the impacts of COVID-19 on the delivery of the 2021 census and explored a number of [options](#) to preserve this census date. The conclusion by NRS was that the only option in which there was confidence around securing the high response rate required was to move the census to 2022. Following the recommendation, Scottish Ministers decided to move Scotland's Census to March 2022 to ensure that a full and successful census is undertaken.

The census in March 2022 will follow the same model and question set as planned for March 2021. We will work closely with our stakeholders and partners to ensure that appropriate data are available to support work that was expecting to make use of Census 2021 data. We will also continue to work closely with our colleagues in the Office for National Statistics (ONS) and Northern Ireland Statistics and Research Agency (NISRA) to ensure the needs of data users in Scotland and across the rest of the UK will be met.

## Census legislation

The Census Act 1920 ("the 1920 Act") provides for a census to be taken not less than five years after the previous census. The 1920 Act applies to England, Wales and Scotland. In Scotland it is the duty of the Registrar General to undertake the census, in accordance with the 1920 Act and any Order in Council or regulations made in terms of the 1920 Act, under the direction of Scottish Ministers.

Section 1 of the 1920 Act provides the enabling power which underpins the taking of the census. It allows the making of an Order in Council ("the [Census Order](#)") which directs that the census be taken; the date on which it is to be taken; the persons by, and in respect of whom, returns are to be made; and the particulars which are to be stated in the returns. The questionnaire (or questionnaires) used in the census are prescribed in regulations ("the [Census Regulations](#)") under section 3 of the 1920 Act. This is where the census questions, as they will be seen by individuals completing the questionnaires, are legally set out. The questions must, of course, solicit the particulars set out in the Census Order.

All of the legislation required for a census in 2022 is now in force.

### Non-compliance

There is a legal requirement to complete the census. Those householders who do not make a census return may be prosecuted and could receive a criminal record and / or fine. It is also a criminal offence for a person to refuse to answer a census question, or give a false answer. The only exceptions to this are the voluntary questions on religion, sexual orientation and on trans status or history, as enabled by the [Census \(Amendment\) \(Scotland\) Act 2000](#) and [Census \(Amendment\) \(Scotland\) Act 2019](#) respectively. Together, both Acts specifically exclude penalising non-response to these questions.

### **Why have a census?**

For over 200 years, Scotland has relied on the census to underpin local and national decision making. Around 200 countries worldwide now undertake a regular census under the [UN census programme](#). The census is the only survey to ask everyone in Scotland the same questions at the same time. It is unique in the provision of comprehensive population statistics. It is used by central and local governments, health boards, the education sector, the private sector, and the voluntary sector to plan and distribute resources that match people's needs. The information collected must be "authoritative, accurate and comparable" for all parts of Scotland, and down to very small levels of geography. Only the census can consistently provide such information.

Basic information on population size, age, sex and location are crucial to work on pensions, migration, economic growth and labour supply. Other information gathered helps governments to:

- identify housing demand and create housing supply including information on household size and family make-up which are crucial to policies on local housing demand and planning, and poor housing and overcrowding;
- identify areas of deprivation, enabling them to target services;
- gather data on equality groups, enabling them to tackle discrimination; and
- gather information on housing.

Census information is also used for a range of social and economic indicators:

- population estimates;
- employment and unemployment rates;
- birth, death, mortality, and fertility rates; and
- equalities data, such as age, sex, ethnicity, religion/belief and disability.

Census data are also used by local public services to meet local needs in health, education, transport, planning, and community care services.

NRS calculated the cost to health board funding allocations if the census was not carried out in 2011. If census figures from 2001 had been used to make population estimates and allocate funding to health boards, in 2014/15 there would have been misallocations of between £30m and £40m. Some health boards would have received more, some less, than their appropriate share.<sup>1</sup>

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<sup>1</sup>[Scotland's Census 2011 General Report](#)

Following the 2011 Census, NRS, in conjunction with the other UK Census offices, explored alternative ways to produce population statistics. NRS identified potential options and examined and compared various approaches to counting the population, both here and overseas, engaged with a diverse group of users, commentators and public bodies, and undertook qualitative and quantitative research into attitudes to the census and population statistics. More information on the work which was done can be found in the [Beyond 2011](#) section of the NRS website.

Having considered all the [evidence](#), in March 2014, NRS recommended that a modernised 'traditional' census was the best way to meet users' needs. Specifically, NRS announced its intention to focus on planning for a census in 2021, which would be primarily online, while offering alternative modes of completion where necessary, and also aiming to make best use of technology and administrative data in its design, building on the online approach used successfully in the 2011 census.

The main objectives of Scotland's Census 2022 are to:

- produce high-quality results;
- generate outputs that meet the needs of our users;
- maximise online response rates for the census;
- produce timely outputs to maximise benefits;
- protect, and be seen to protect, confidential information;
- do so in a cost effective way; and
- make recommendations for the approach to future censuses in Scotland.

### **Learning from census rehearsal**

As part of our preparations for Scotland's Census 2022, NRS undertook a public rehearsal in parts of Scotland. The rehearsal took place during October and November 2019. People living in households in parts of Glasgow City, and Dumfries and Galloway, and Na h-Eileanan Siar were asked to help by taking part, and received a letter in early October with more information about the rehearsal and how to participate.

Unlike the census itself, participation in the rehearsal was not a legal requirement. Householders in these areas were asked to take part on a purely voluntary basis to help ensure things go smoothly for the main Census in 2022. Field force and communal establishment enumeration operations were not included in the rehearsal activities and a temporary contact centre was created internally within NRS for the purpose of supporting the rehearsal.

The rehearsal also provided reassurance that our chosen approaches in many respects worked well. For example, initial contact materials and reminder letters were effective in encouraging returns, elements of our local engagement and marketing strategy tested strongly, and the overall design and functionality of the online and paper questionnaires allowed the public to complete returns and deliver usable data for our systems.

The rehearsal did importantly identify some new areas of improvement for NRS to take forward. These included the need to:

- make improvements to how we collect address information;
- make improvements to some online question routing;
- review the timing and tailoring of reminder letters; and
- improve the provision of management information.

The rehearsal evaluation report can be found [on the Scotland's Census website](#).

### **Barriers to participation**

The numerous uses made of census data outlined above represent a key benefit and the positive impact of the census. However it is recognised that there are a number of barriers and challenges, which can potentially limit or hinder participation in the census. These include lack of awareness, lack of understanding, privacy concerns, language, mistrust in/lack of engagement with officialdom, impairments such as physical or learning disabilities, and known limitations around the 'reachability' of communities and groups. Some relate specifically to digital participation, such as digital access or connectivity issues, lack of digital skills or confidence, data security concerns and mistrust of digital systems. User research and testing from 2018, 2019 and 2021 has helped us understand the user experience of people who may face barriers to completing the census.

Significant market research was also undertaken in 2021, focussing on attitudes and knowledge towards the census and potential barriers to completion. More information is provided in the communications and engagement section below.

### **Digital participation**

The public sector in Scotland is committed to respond to the changing expectations of customers by realising the opportunities that technology provides and delivering an increasing proportion of services online. Part of the Scottish Government's Digital Strategy is to increase digital participation in order to enable social mobility and tackle persistent inequalities. The online delivery of public services will also provide services which are easier, quicker and more convenient for people to use, and at a lower cost than other methods allow. The [UK Government's Digital Efficiency Report](#) suggests that transactions online are 20 times cheaper than by phone, 30 times cheaper than by post and as much as 50 times cheaper than face-to-face.

In general terms Scotland can be considered a digital nation. The [2019 Scottish Household Survey](#) (SHS) reports that home internet access has increased steadily over time, reaching an all-time high of 88% of households in 2019. Previously, other sources have shown that 40% of people are reported to have a tablet computer (SCVO, 2015) and 63% use a smartphone (Ofcom, 2015a).

While this information is a useful indicator of internet availability, it is not necessarily indicative of potential response to a requirement to use the internet for a specific task such as completing a census form. A report published by the Carnegie UK Trust (Carnegie UK, 2014) highlights this fact noting that the barriers to getting online are multiple, varied and complex. They state that "being digitally connected is not the same as being digitally included". The same point was also made in a report

outlining research looking at links between digital and social disengagement (Helsper, 2008) which notes “simply providing access to these platforms is not enough – digital disengagement is a complex compound problem involving cultural, social and attitudinal factors and in some cases informed ‘digital choice’”.

It is important therefore to have a full understanding of all factors influencing internet use before any assessment of potential digital participation can be made.

Everybody has their own individual set of circumstances and their own reasons for not being online. The four main kinds of challenge people face are:

- access (accessibility, location, cost, technology, infrastructure, language);
- skills (literacy, digital, security, confidence);
- motivation (risks, necessity, financial benefits, social benefits, health and wellbeing benefits); and
- trust (identity, security, standards, reputation).

The first two, a lack of access or skills, result in ‘Digital Exclusion’ while the latter two, lack of motivation or trust, may be best grouped with those situations where individuals have access and make use of the internet but will choose not to complete an online census as ‘digital choice’.

Both digital exclusion and digital choice could have a significant impact on online response rates. Therefore, it is important that a focus for Scotland’s Census 2022 is on promoting online participation and not just tackling digital exclusion.

We are also keenly aware of the demographics and infrastructural aspects of the digital connectivity landscape in Scotland. Households with higher income are more likely to have internet access. Households with lower incomes and households in Scotland’s most deprived areas are less likely to have home internet access., but the gap has narrowed in recent years. Internet access varies by tenure. In 2019, 79% of those in social rented housing had internet access compared with 91% of households who owned their home.<sup>2</sup>

The option of submitting census questionnaires online was introduced for the first time in 2011 to those living in households; those living in communal establishments were only able to complete on paper. Around 20% of all returns were submitted online. The 2022 Census is being designed under the principle of ‘Digital First’ with a target online completion ratio of at least 70%.

Online services will be promoted through a number of different routes, such as community engagement activity, publicity initiatives, websites, contact materials and information leaflets. To reflect the steep rise in the use of social media in recent years, there will be a much greater emphasis on the use of social media as part of the programme’s marketing and publicity activity, to satisfy increased customer demand and expectation.

The move to a primarily online census, including a change in enumeration strategy (e.g. post out of contact materials instead of enumerator hand delivery), will reduce the direct contact between householders and field staff. Public assistance channels

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<sup>2</sup> [Scottish Household Survey 2019: Annual Report](#)



and services together with publicity and marketing will have a critical role in compensating for this and encouraging and enabling maximum response.

We are monitoring broadband roll-out initiatives overseen by the Scottish Government and Highlands and Islands Enterprise which have set ambitious targets for broadband coverage across Scotland. We will continue to track progress against such initiatives to develop and maintain knowledge of those localities where digital access presents the biggest challenge, so we can best channel our support and assistance efforts.

### **3. Delivering Scotland's Census 2022**

#### **Communications and engagement**

A detailed integrated communications and engagement strategy has been developed focussing on those groups most at risk of non-participation, identified by market research.

Initial market research was conducted over four phases to understand more about public knowledge about the census, what their motivations would be to help them complete the census and what messages resonate best to help promote the census. We then conducted and completed further public research in November 2020 to assess the impact of the coronavirus pandemic on public perception and knowledge of the census.

Eight key groups have been identified as potentially being less likely or able to complete the census. While we aim to reach all of Scotland through our marketing and advertising campaigns, messaging will be tailored to these key audiences using a range of platforms, including social media, PR, marketing and community and stakeholder engagement.

All communications and engagement material will be aligned to contact activity with the public.

#### Marketing and PR campaign

A three-phased approach has been developed aiming to reach all of Scotland, covering awareness, persuasion and action. Media will be targeted for each of the marginalised audiences, particularly in the persuasion and action phases. This will include television, radio, out of home posters and digital ads.

The creative concepts have gone through two rounds of public testing with our key audiences both in group sessions and in one to one in-depth sessions.

The marketing activity will be supported by the PR campaign which will also incorporate the three phases and again focus on those hard to reach groups. This activity will include media relations and social media.

#### Stakeholder and community engagement:

NRS is engaging with key stakeholders, including Scottish Government, local authorities and key organisations and partners across the Third Sector, to ensure

messaging about the census and its value reaches those at most risk of non-participation. This engagement will be supported by a 'field and partnerships' campaign to develop in-depth partnerships with stakeholders with reach to our key groups.

#### Online Collection Instrument:

The Scotland's Census 2022 Online Collection Instrument will be made-up of three public-facing systems: the online questionnaire, a website and a request system for ordering products. The website will provide access to the online questionnaire and will feature a wide range of help and guidance, including accessible videos and access to web-chat.

To inform the design and iterative development of the online experience, we have performed the following User Research/User Testing:

- Accessibility Testing with Users (Dec 2018 – March 2019)
- Audience Discovery Research (Dec 2018 – March 2019)
- Information Needs User Research (Dec 2018 – March 2019)
- Tree-Testing – (June 2021 – August 2021)
- Usability testing (June 2021 – Sept 2021)

Other activities that have been performed to support the usability and accessibility of the online experience include:

- OCI Accessibility Audit (3<sup>rd</sup> Party) – March 2020
- Content review (3<sup>rd</sup> Party) – May 2020

A further accessibility audit will be conducted on the online system in November 2021. This will identify any further refinements needed to ensure the online experience is as accessible as possible.

This work has provided valuable insights into the needs and motivations of different groups and communities. These include people with digital skills limitations, low literacy, reading impairments, English language limitations, people from ethnic minorities and marginalised groups.

#### **Scotland's Census website**

In preparation for Scotland's Census 2022, we have developed a new website to host census results and supporting information.

The website was developed using the [Digital First Service Standard](#), a core part of the Scottish Government assurance framework. This is a set of 22 criteria that aims to make sure that services across Scotland are continually improving, and that services are being designed with users. NRS successfully completed an assessment against this criteria before the website was launched in May 2021.

Throughout the development of the website we completed a number of user testing sessions. This included users with a variety of education levels, occupations, digital skills, locations, ages and levels of awareness of NRS and census. These sessions ensured that the service was useable and accessible for users of census data.

An example of some of the user-centred features we included are:

- **Dark mode**

During usability and accessibility testing, users suggested that they found it much easier to consume information using dark mode on their devices, but that not all websites were compatible. In particular, users with dyslexia said they preferred the inverted colours of dark mode and found it easier to focus on longer paragraphs of text on a dark background. As a result of this testing we added this option to the website ahead of launch.

- **Gaelic content**

Outputs from the 2022 census will be accessed through the new website. We identified a user need for Gaelic content on the website, we have discussed this with stakeholders and the feedback received will inform how we present this for Gaelic users. We will continue to develop the website this year as we work towards the census in 2022. During this time we will identify content to be presented in Gaelic on the website. The most significant part of this work will be when we create new content in 2023 as the new census data are added.

- **British Sign Language**

Similar to the plan for use of Gaelic on the website we are engaging with stakeholders to plan how we use BSL with the Scotland's Census website.

Following feedback from stakeholders, we have identified some potential development work to the website that will help us integrate BSL content. We are planning to carry out this development work ahead of outputs being published in 2023.

Alongside the website we are developing a plan to provide assisted digital support to users who require assistance accessing the census results offline.

The period between launch of the website (May 2021) and new data being released is being used to iterate and continuously improve the offline support provided by NRS.

## **Public assistance**

### A Digital First census

In-line with the Scottish Government's "[Programme for Government 2021-2022: A Fairer-Greener Scotland](#)" – Scotland's Census 2022 seeks to support a digitally inclusive and connected Scotland.

*“Over the past 18 months, the Coronavirus pandemic has changed our way of life fundamentally. Many of us have worked successfully from home and we have come to rely on home shopping, online education and new and creative ways of using digital technology to keep in touch with family and friends.*

*But, it has also demonstrated the problems that come from digital exclusion. It has reminded us that whilst technology can transform lives for the better, it is essential we ensure no-one is left behind.”*

**Source: Page 78, Programme for Government 2021-2022: A Fairer-Greener Scotland**

Scotland's Census 2022 is intended to be a predominantly Digital First census, with paper questionnaires only being made available on-request. We have been working with our digital delivery partner(s) to assure that the online census questionnaire is a modern, usable and accessible digital platform that meets citizen expectations of a government service.

The same standards of usability and accessibility have also been used when developing the [www.scotlandscensus.gov.uk](http://www.scotlandscensus.gov.uk) (Outputs) website.

Both digital platforms have been tested to work on different browsers and devices, and have met the criteria of the [Digital First Service Standard](#).

Provisions have also been made to offer alternative options for census completion for those who choose not to complete online, or who cannot complete online.

### Digital exclusion

Despite the pandemic resulting in an increase in digital participation and adoption - it is considered that digital exclusion may still apply to:

- older generations and those who have poor digital access or IT connectivity issues,
- those that may lack the digital skills or confidence to complete an online form; or,
- those who simply do not have a device or have data security concerns about submitting a census form.

We continue to work with public sector organisations across Scotland to understand what else can be done to support these audiences who are digitally excluded.

### Other barriers to participation

In addition to digital exclusion there are a number of other barriers and challenges that may limit or hinder individual participation in a digital census. This includes lack of understanding, language difficulties, public mistrust or lack of interest and engagement with officialdom, visual impairments, physical or learning disabilities

and/or other known barriers around 'reachability' of communities and marginalised audiences.

Under the banner of "Public Assistance" the census programme has developed a number of Help and Support strategies for these audiences.

Public assistance delivery model

On account of the coronavirus pandemic, the programme has had to adapt its original Public Assistance Delivery Model and Plans.

Originally there had been the intent to create a national network of support hubs via libraries and using the physical estate of other public sector organisations, but it has been considered that this may not offer Value for Money (VfM) at this time when COVID-19 restrictions may be reintroduced preventing the effective promotion and participation at these support hubs.

Based on the lessons-learnt of what has "worked-well" from ONS and NISRA around their Census 2021 experience we are investing in our:

- Language and Accessibility support products; we are,
- Increasing the capacity of our contact centre operation; and we are,
- Leveraging our stakeholder networks and community engagement activity.

Support	Description
Central services and support	Centrally, we will offer 2 primary routes for accessing Public Assistance <ul style="list-style-type: none"> <li>• Online at <a href="http://www.census.gov.scot">www.census.gov.scot</a> and via the,</li> <li>• Free Helpline on 0800 030 8308</li> </ul>
Decentralised services and support	Our Field Force and Enumeration teams will provide a decentralised Public Assistance offer (i.e. support and encouragement to complete your census with sign-posting to other help and support available).
Language and Accessibility Support Products	We will offer help and support in different languages and accessible formats.
Translated Guidance	Translated questionnaire guidance will be available in 16 languages to download from the website at <a href="http://www.census.gov.scot/languages">www.census.gov.scot/languages</a> . These translations are intended to help users complete the paper questionnaire in English.  In addition to accessing the translated questionnaire guidance online, users can contact the free Helpline number on 0800 030 8308 if they would like a printed version posted to their home.  They will also be able to request a paper copy of the English language questionnaire if they do not already have one.
Language Support Line	Support will be available in most languages over the phone, and a dedicated language helpline (0800 030

	<p>8333) has been set up to provide language support and translation services.</p> <p>This service will be promoted via the Household Information Leaflet to all Households.</p>
Gaelic (Ghàidhlig)	<p>Individuals will be able to complete their census online by switching to Gaelic before they start to complete. This functionality will offer translations of the census questions and question help.</p> <p>Key parts of the website will also be translated in Gaelic, and the following products will be available to download:</p> <ul style="list-style-type: none"> <li>• A 'Gaelic Guidance Booklet' (PDF)</li> <li>• A Gaelic translation of the Contact Letter (PDF)</li> </ul>
Accessibility Products	<p>Individuals will be able access help in British Sign Language, Easy Read, braille, audio and large print – to help complete their census.</p>
British Sign Language (BSL) support	<p>The online questionnaire has BSL translations for each question to help BSL users to complete the census, and the website also contains BSL translations for all primary pages.</p> <p>A text relay service is also available on <b>18001 0800 030 8308</b> and BSL users can also contact us by using <b>contactSCOTLAND-BSL.org</b>, Scotland's national BSL interpreting video relay (IVR) service.</p>
Large Print	<p>If you have a visual impairment or struggle to read regular print, users will be able to order a large print version of the household questionnaire.</p> <p>This product will also include additional guidance for completing the questionnaire in large print.</p>
Braille	<p>Individuals will be able to order a translation of the household paper questionnaire in braille.</p>
Easy Read	<p>An Easy Read guide (PDF) can be downloaded from the website, or alternatively individuals can request that a printed version be sent to them via post.</p> <p>The guide tells you about the census and how to complete it in 'plain English'</p>
BSL, audio and subtitled question help on DVD or USB	<p>Individuals will also be able to request</p> <ul style="list-style-type: none"> <li>• British Sign Language translations of the paper questionnaire on USB or DVD</li> <li>• an audio CD of the paper questionnaire questions</li> </ul> <p>To order these products, you will need to let the contact centre know:</p> <ul style="list-style-type: none"> <li>• your name</li> <li>• address and postcode</li> <li>• how many you need</li> </ul>

Audio CD	Individuals will be able to order an audio CD version of the household paper questionnaire.
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### Contact centre

Our Contact Centre will open on 28 February 2022. This will provide individuals with a free, dedicated Helpline that can be used for Help or Support when completing your census.

Our contact centre team will be trained to deal with common queries, print product requests and complaints.

The hours of operation will be:

- Monday to Friday: 8am to 8pm
- Saturday and Sunday: 9am to 4pm
- 19 and 20 March: 8am to 8pm

Calls are free-of-charge from UK landlines and mobile phones.

The Contact Centre will deal with queries via social media, e-mail, webchat and IVR. They will provide basic IT technical support helping users with their login difficulties and support users with the completion of telephone captured questionnaires via the online process.

The Contact Centre will also be able to request replacement Internet Access Codes to be issued to respondents. These codes will be sent by paper, text or email.

Contact Centre and field force staff will be able to provide assistance to support completion, as well as Telephone Data Capture (TDC). This includes assistance for those seeking to complete an individual questionnaire as part of a household. In addition, the census questionnaire can be completed on behalf of the householder by a family member/friend/carer.

### **Field operations and recruitment**

The field force which supported Scotland's Census 2011 was in the region of around 7,500 staff who were responsible for hand-delivery of paper census questionnaires to the vast majority of Scotland's households. In 2022 initial contact with households will be by letter and field force responsibilities will focus on following up non-response. The field force will be around half the size of that in 2011.

Field force staff will be recruited across the country and we will seek to best represent the people of Scotland within our workforce, in full compliance with relevant employment legislation.

### **Data collection**

Respondents will be able to complete the census questionnaire online, or can request a paper questionnaire for return by post. Enumeration processes include the use of a robust address list to ensure every household receives instructions on how to make a census return. This is complemented by deployment of a field force who

will seek to ensure every household and communal establishment is able to participate in the census. The Census Coverage Survey, which follows up a sample of the main operation, assesses the extent of coverage across the whole population.

### **Data processing and statistical outputs**

Statistical data processing, and the methodology underpinning it, will seek to ensure that all data captured by the census are processed appropriately and consistently to best meet the identified user needs, and are considered throughout the data lifecycle. Statistical Disclosure Control policies and processes protect individuals, particularly those who hold less prevalent protected characteristics, from being identifiable from census outputs.

## **4. Assessment process**

This assessment will consider how the Scotland's Census 2022 may impact on those rights enshrined in the [Human Rights Act 1998](#) and treaties such as the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights.

The assessment will be revised and updated to take account of any perceived changes to our anticipation of human rights impacts in advance of and beyond the live census.

The most significant changes for the 2022 Census are:

- The move to a predominantly online census; and
- New voluntary questions on sexual orientation and trans status or history.

The Human Rights Impact Assessment (HRIA) for Scotland's Census 2022 sits amongst a suite of other assessments which seek to consider, anticipate and assess the full impact of Scotland's census on people and things. There are some commonalities across these different assessments and some have strong relevance to others. In particular there is some common ground between this assessment and the Equality Impact Assessment, the Children's Rights and Wellbeing Impact Assessment and the Data Protection Impact Assessment.

NRS undertook a period of consultation throughout September 2019 for each of the Impact Assessments accompanying the Census Order. Impact Assessments have been updated to reflect feedback where appropriate. A report on the outcome of this period of consultation has been published on the [Scotland's Census website](#).

## **5. 'PANEL' Approach**

This section seeks to demonstrate how Scotland's Census supports 'PANEL' principles (Participation, accountability, non-discrimination and equality, empowerment, legality), considered to be of fundamental importance in applying a human rights based approach to policy-making and delivery in practice.

**Participation** - Everyone has the right to participate in decisions which affect their human rights. Participation must be active, free, meaningful and give attention to issues of accessibility, including access to information in a form and a language which can be understood.



Every household and communal establishment in Scotland is legally obliged to participate in the census. It is therefore incumbent on NRS to ensure that all have the opportunity to do so. Consultation and engagement processes are inclusive and census questionnaires, systems, guidance and materials will use plain language, be accessible and available in a range of community languages (e.g. Scottish Gaelic, Polish, Romanian, Urdu, Hindi, Arabic, Mandarin, Kurdish) where possible. The impact assessment involves stakeholder feedback mechanisms and the views and opinions of stakeholders will influence design and operational considerations where necessary. More detail on the engagement and testing processes employed to take full account of stakeholder input can be found in the following section.

It is essential to ensure that everyone is supported to participate in the census. Extensive stakeholder engagement has indicated those with certain disabilities or impairments may have specific needs. Those with certain disabilities and impairments may have difficulty completing a census questionnaire. They may also have challenges in accessing or understanding contact materials and guidance.

Some individuals with certain impairments may be more likely to have poorer digital skills and/or confidence.

Public assistance services will offer a wide range of support products including British Sign Language (BSL) translation, Braille questionnaire guidance, large print and an easy read guide to the census. Live interpretation for BSL users will also be available via contactSCOTLAND-BSL, a Scottish Government funded public service. BSL translation videos of the questions and question help will be embedded within the online questionnaire with each question, as well as other transactional parts of the online questionnaire. BSL translations of census questions and help as they appear on the paper questionnaire will be available to order on DVD or USB.. Audio clips will also be available for customers to request on CD. Text and Video Relay will be available to request any of these products or simply to ask us a question. Products can also be requested by calling our Contact Centre, web chat, eForm, social media, e-mail or by post. Design of contact materials has given consideration to impairments to ensure they can be read and understood.

Extensive engagement with stakeholder organisations who represent disabled people has been and will continue to be undertaken to understand their needs and circumstances better and the barriers to participation they may experience. Learnings have influenced field force and contact centre staff training and the design of help and guidance.

We have designed our website to be as accessible and usable as possible for all abilities and disabilities, including older audiences and those with visual, hearing, cognitive or motor impairments. This includes the use of various assistive technologies by allowing navigation using a keyboard only, by using easier-to-read colours, dark mode option, larger fonts and plain English.

The overall objective for content, such as question help, web and printed content, website navigation and user help and assistance is to support the user journey and user experience of Scotland's Census 2022 to be as seamless, efficient and quick as possible. It will align with the [Scottish Government's Digital First Service Standards](#). All such written content will have the target reading level of an average nine-year-

old's reading ability. This will allow for a wider range of literacy to make use of the service. We will strive to ensure the tone of our content is accessible, authoritative, friendly and helpful.

**Accountability** - *Accountability requires effective monitoring of human rights standards as well as effective remedies for human rights breaches. For accountability to be effective there must be appropriate laws, policies, institutions, administrative procedures and mechanisms of redress in order to secure human rights.*

The full set of impact assessments for Scotland's Census 2022 have sought to assess and demonstrate compliance with a range of legislative and policy requirements. The nature of these assessments requires continuous monitoring of anticipated impacts as planning and delivery develop. The programme to deliver Scotland's census has a lengthy lifecycle which extends over a number of years and different phases, and future iterations will reflect the nature of this progressive process. There is overall public confidence in the census which has traditionally resulted in high levels of participation and low levels of non-response. The legal obligations in play may also be a significant factor in this. NRS has thoroughly [evaluated](#) its experience during the census rehearsal in 2019 and has taken full account of audience research and testing and stakeholder feedback in defining plans for the live event in 2022.

**Non-discrimination and equality** - *A human rights based approach means that all forms of discrimination in the realisation of rights must be prohibited, prevented and eliminated. It also requires the prioritisation of those in the most marginalised situations who face the biggest barriers to realising their rights.*

The [Equality Impact Assessment](#) seeks to identify and mitigate any negative impacts in support of the NRS's Public Sector Equality Duty to eliminate discrimination and advance equality of opportunity. The equality of opportunity for all to fulfil their legal obligation to participate in the census, by having the opportunity to complete a questionnaire, is vital in meeting compliance with human rights requirements. Extensive user research has been undertaken to identify and address any accessibility issues and barriers to completion experienced by different groups, particularly in the context of a predominantly online census. Groups including some disabled people and those for whom English is not a first language perhaps need the greatest support in terms of adjustments to accommodate their participation and NRS has been working to provide appropriate support. In addition, the impact of all questions on people must be considered as must the effect of limiting some questions by age. For example, the question on sexual orientation is only asked of those 16 and over and therefore statistical outputs will not be produced for under 16s and will limit the development of policy and provision of services for LGB young people.

**Empowerment** - *A human rights based approach means that individuals and communities should know their rights. It also means that they should be fully supported to participate in the development of policy and practices which affect their lives, and to claim rights where necessary.*

A purpose of this, and other impact assessments, is to raise the awareness of census respondents and other audiences to the existence of their rights, whilst

highlighting how NRS will support them. In addition, the NRS privacy notices and guidance to support the questions asked in the census are clear on how Scotland's 2022 Census impacts on certain rights, such as Article 8 of HRA – “the right to private and family life”. This assessment process will feature a firm focus on stakeholder feedback.

**Legality of rights** - *A human rights based approach requires the recognition of rights as legally enforceable entitlements and is linked in to national and international human rights law.*

As a major data collection exercise the census must demonstrate its compliance with legislation which upholds certain rights such as the UK General Data Protection Regulation, Data Protection Act 2018 and Human Rights Act 1998. All questions asked by the census must be in accordance with civil liberties and human rights legislation and principles.

Analysis of how Scotland's Census 2022 may affect certain rights is drawn out in the remainder of this assessment.

## 6. Analysis of Rights and Anticipated Impacts

There are a number of rights on which the census has little or no direct impact. However, many are indirectly supported by the principal output and benefit of the census, which is the production of a rich source of high-quality demographic statistics which describe the number, characteristics and condition of Scotland's population.

As noted above, there are numerous uses made of census data across many sectors, not least the allocation of funding and resources to national and local services, equalities and diversity monitoring and environmental development. The third sector, commerce and academia are also major users of census data.

The census can therefore be considered as having a positive impact on those rights which pertain to education, health, minority rights and equalities.

A failure to obtain accurate population statistics would impact on the ability of relevant public authorities to allocate resources in a way that supports the realisation of economic, social and cultural rights, including: -

- the right to social security
- the right to an adequate standard of living (including adequate housing and adequate food)
- the right to the highest attainable standard of physical and mental health
- the right to education
- the right to take part in cultural life.

These rights are enumerated in the [International Covenant on Economic, Social and Cultural Rights \(ICESCR\)](#) at Articles 9, 11, 12, 13 and 15.

A closely-related set of economic and social rights is set out in the [European Social Charter](#), which is a Council of Europe instrument.

Scotland's Census also has relevance to the fulfilment of rights under the [UN Convention on the Rights of the Child \(UNCRC\)](#), and the [UN Convention on the Elimination of all Discrimination against Disabled People \(UNCRPD\)](#). In both cases there is a need to have accurate up-to-date information about these sections of the overall population in order to properly inform public policy-making and support the realisation of human rights. Similarly, information collected in the census supports good policy-making and appropriate resource allocation in ways that help to meet obligations under the [UN Convention for the Elimination of all Discrimination against Women \(CEDAW\)](#) and the [UN Convention for the Elimination of all Racial Discrimination \(CERD\)](#).

Those rights which are more directly impacted are considered below.

**Article 8 of the Human Rights Act** states:

*Right to respect for private and family life:*

- 1. Everyone has the right to respect for his private and family life, his home and his correspondence.*
- 2. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.*

The matter of privacy is relevant across the whole range of census questions, given the range of data collected. In particular, questions such as country of birth, date of entry, passport held, language, religion and ethnic group may not give rise to concerns individually but collectively, and in conjunction with other data held by government, they could be perceived as intrusive by some respondents. The same issue could be true of new questions on sexual orientation and trans status/history.

Section 2 of the 1920 Act states that "It shall be the duty of...the Registrar General for Scotland in relation to Scotland to make such arrangements and do all such things as are necessary for the taking of a census."

The provisions of Article 8 as incorporated in the Human Rights Act 1998 allow public authorities to enquire into a person's private life where they have a legal authority to do so and where such an enquiry is necessary in a democratic society for one of the aims stated in the Article.

The requirement to comply with the census is therefore entirely in accordance with the Human Rights Act in that the lawful authority is given by the 1920 Act and that it is necessary for the economic well-being of the country and for the purposes of the protection of health and the rights and freedoms of others.

Unauthorised disclosure of census data, which is an offence under the Census Act 1920, is a known risk which, if realised, would constitute a breach of Article 8.

A Scotland's Census Data Protection Impact Assessment has been undertaken which seeks to identify and explore risks to privacy and information security.

## **New voluntary questions**

Scotland's 2022 Census will ask two new voluntary questions, around sexual orientation and trans status or history which could potentially be considered sensitive and intrusive, placing further focus on any perceived interference with Article 8. The Census (Amendment) (Scotland) Act 2019 enables these new questions on sexual orientation and trans status/history to be asked on the same voluntary basis as the religion question.

The 2019 Act itself does not require that questions on sexual orientation, trans status or history be included in the census. The 2019 Act, in the case of any question in respect of sexual orientation, ensures that there is no penalty applicable for refusing or neglecting to answer the question. In the case of a question, in terms of trans status/history being specified, the 2019 Act similarly ensures that no such penalty applies. The 2019 Act therefore allows questions on these matters to be asked in a way which should not adversely impact upon the right to a private and family life under Article 8.

### Trans status or history

The census has never previously asked questions around trans status or history. The 2015 Topic Consultation highlighted a need for information on 'gender identity'. Further consultation and testing refined this data need to being about the size and geography of the trans population – both those who currently identify as trans as well as those who might have a trans history. Given the lack of alternative data sources, and the small populations, this makes census the only statistical collection likely to gather robust data on the trans population. A key reason for requiring census data on trans status is to be able to fulfil the public sector equality duty.

Following stakeholder engagement to understand data needs fully, NRS tested a trans status or history question, alongside the sex question to replicate responses as they would be perceived in the census itself. Testing found the trans status question was acceptable to members of the trans community and to the general population, and produced good quality data.

Respondents were able to answer the question on trans status with ease on behalf of themselves - around 94% of respondents provided a valid response to the question on trans status. Respondents indicated they were comfortable answering on behalf of another member of their household if they had their permission to do this. Stakeholders had a range of views on potential age limits for asking the trans status or history question. Whilst some stakeholders suggested age limits of 16 or below 16 years (such as 12 or 13 years), others suggested it should be asked of all regardless of age.<sup>3</sup> Respondents in cognitive testing indicated the question should be asked of all regardless of age.

Public acceptability testing for the gender identity topic was carried out in January – March 2017, for the three UK census offices. In Scotland, 5,000 households were invited to take part. Public acceptability testing is designed to explore the views of the public on the acceptability of including sensitive questions in the census, thereby

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<sup>3</sup>[Scotland's Census 2022 Sex and Gender Identity Topic Report](#)

identifying particular sensitivities and potential barriers to public confidence and exploring mechanisms for overcoming concerns. This showed, in the context of providing an answer on behalf of another household member aged 15 or under, the proportion who found the question acceptable decreased from 74% to 58%, and the proportion who found the question unacceptable was 16% (compared with 9% for those aged 16 or over). The proportion who were undecided increased from 16% to 26%. The acceptability testing also highlighted the proportion of the public who reported they could not answer accurately for any members of their household increased from 4% when asked of those aged 16 and over, to 9% when asked of those aged 15 and under. The results of public acceptability testing showed that while the general public found the inclusion of a question was acceptable, acceptability decreased if asked of those aged under 16 years. Therefore, whilst some need for data on trans status of under 16 year olds was identified, asking a gender identity question of those aged 15 and under was less acceptable.

Some concerns have been expressed during the question development process about confidentiality in relation to sensitive questions, particularly for young people who may feel unable to answer the question if they still live at home with their families. Missing this group would be an issue as young trans people have specific service needs. To provide complete privacy and confidentiality and freedom of expression for any person responding to the 2022 Census, the facility to request and receive an individual questionnaire for completion in confidence will be available to all people over the age of 16 who are capable of completing a return. Any such individual will therefore be able to complete an individual form without other members of the household being aware.

It is recognised that this is a sensitive question and no-one should be compelled to answer it. The Census (Amendment)(Scotland) Act 2019, enables a trans status/history particulars to be sought in the census on a voluntary basis so long as they are specifically prescribed for that purpose in a Census Order. The Census (Scotland) Amendment Order 2020 includes provision prescribing the trans status/history particular for that purpose.

### Sexual orientation

The census has not previously asked about sexual orientation but it is a question to be included in 2022 .

Scotland's [Equality Evidence Strategy 2017-2021](#) states that data on sexual orientation had improved in recent years. However, gaps persist, and official sources are likely to undercount the proportion of the population who are lesbian, gay or bisexual.

Considerable user demand was identified from the 2015 Topic Consultation for the collection of information on sexual orientation in the 2022 Census. The main requirement identified is in relation to the monitoring and reporting duties for public bodies, and service planning and provision. The information is also required to inform equality impact assessments, which in turn inform policies and practices. The Equalities and Human Rights Commission require this information to use in a statutory review of equality and human rights, which is carried out every five years.

Research and development carried out across UK census offices found a sexual orientation question (asked of those over 16 years) was generally acceptable to the public and the majority of respondents would provide a valid response. 15% said that it was not acceptable however acceptability decreased with age. Only 4% of those aged 25-34 years and 11% of those aged 35-44 years indicated that a question of this nature was unacceptable. In comparison, 27% of those aged 65-74 and 30% of those aged 75 or over indicated that a question of this nature was unacceptable.<sup>4</sup>

Overall, 14% of participants said they would not answer a sexual orientation question if it was included in the 2022 Census. The majority of these (13% of all participants) said they would skip the question and continue completing the rest of the form. Only a very small proportion of participants said that they would request an individual form (less than 1%) or stop completing the census altogether.

Clarification on why information regarding sexual orientation is required and additional reassurances of information security should go some way to addressing reluctance to answer the question.

In the context of completing the census on behalf of another household member, the proportion who found the question not acceptable increased to 20%. Similarly, just over one in five people (21%) indicated that they were not comfortable with providing this information on behalf of others.

Testing of the questions showed almost all participants provided a valid response to the question on sexual orientation. Of those who did not provide a response to the sexual orientation question, the majority were aged 65 or over (59%). Less than 1% of participants provided an invalid response to the question. The question was voluntary and, as such, 9% of participants chose not to provide an answer.

On this basis, the sexual orientation question will be asked in the 2022 Census on a voluntary basis and the Census (Amendment) (Scotland) Act 2019 enables this. The question will only be asked of those aged 16 years and older.

As with trans status or history, some concerns have been expressed during the question development process about confidentiality in relation to sensitive questions, particularly for young people who may feel unable to answer the question if they still live at home with their families. Missing this group would be an issue as young people have specific service needs. To provide complete privacy and confidentiality for any person responding to the 2022 Census, the facility to request and receive an individual questionnaire for completion in confidence will be available to all people over the age of 16 who are capable of completing a return. Any such individual will be able to complete an individual form without other members of the household being aware.

**Article 9 of the Human Rights Act** states:

*Freedom of thought, conscience and religion:*

*1. Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief and freedom, either alone or in*

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<sup>4</sup>[Scotland's Census 2022 Sexual Orientation Topic Report](#)

*community with others and in public or private, to manifest his religion or belief, in worship, teaching, practice and observance.*

*2. Freedom to manifest one's religion or beliefs shall be subject only to such limitations as are prescribed by law and are necessary in a democratic society in the interests of public safety, for the protection of public order, health or morals, or for the protection of the rights and freedoms of others.*

The right to religious freedom and privacy is also protected and preserved under Article 18 of the International Covenant on Civil and Political Rights (ICCPR).

The Census Act 1920 requires responses to all census questions to be mandatory, with the exception of those in respect of religion, sexual orientation and specified particulars regarding trans status/history. The census religion question is voluntary because it can be a sensitive and personal issue.

The question on religion was introduced in the 2001 census, and its inclusion was allowed on the basis that answering it was voluntary. Consultation with users has shown that public bodies use the census information on religion to assist with monitoring discrimination, linked to the introduction of the public sector equality duty. The data have also been used to inform service provision for health, social care and education.

The religion question will again be asked on a voluntary basis for 2022. This reduces the impact of any lawful interference with the right to respect for private and family life under Article 8 of the Human Rights Act, and positively supports article 9 on the right to freedom of thought, conscience and religion, as well as article 18 of the ICCPR.

**Article 14 of the Human Rights Act** states:

*Prohibition of discrimination*

*The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.*

There is no differential impact on the enjoyment of another convention right on the basis of Article 14 grounds.

The [Scotland's Census 2022 Equality Impact Assessment](#) discusses in detail how NRS is discharging its Public Sector Equality Duty under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations in relation to protected equality characteristics including sex, race, disability and religion. The duty in turn supports the UN Convention on the Elimination of All Forms of Racial Discrimination, ratified by the UK in 1969, and the UN Convention on the Elimination of all forms of Discrimination Against Women, ratified by the UK in 1986. Its focus on people with disabilities helps to demonstrate how the Scotland's Census 2022 programme aligns to the UN Convention on the Rights of Persons with Disabilities, which was ratified by the UK in 2009.



The rights of children in the context of Scotland's census are specifically examined in the [Children's Rights and Wellbeing Impact Assessment](#).

NRS considered a limited number of requests for the response options to be reviewed and/or additional information to be collected through the ethnic group and religion questions. The following changes for the ethnic group question have been made:

- inclusion of a tick box for "Roma"
- inclusion of a tick box for "Showman / Showwoman"
- a prompt to write in "Jewish" in the "Other ethnic group" category
- a design change to the "African" category to improve data quality
- a design change to the "Caribbean or Black" category to improve data quality
- a change to the category heading "African" to "African, Scottish African or British African" to improve acceptability and parity.

As with previous censuses, Scotland's Census 2022 will include a tick box for Gypsy/Travellers, who benefit from the protections afforded by the Framework Convention for the Protection of National Minorities, as ratified by the UK.

NRS will continue to work with data users to consider how ethnic group outputs can be created to meet user need best.

Overall, NRS recognises that criminal sanction for non-completion of the census questionnaire is a significant human rights impact, and potentially engages Articles 8, 9, 10 and 14 of ECHR. There may, for example, be individuals who do not, as a matter of conscience or belief, or in exercise of their right to freedom of expression, wish to provide personal information. Criminal sanction is considered proportionate and justified in light of the public policy importance of achieving an accurate and comprehensive census result.

**Article 27 of ICCPR** states:

*In those States in which ethnic, religious or linguistic minorities exist, persons belonging to such minorities shall not be denied the right, in community with the other members of their group, to enjoy their own culture, to profess and practise their own religion, or to use their own language.*

A wide range of community languages will be supported by Scotland's Census 2022 services. Support will centre around translated questionnaire guidance, language support sheets, household and communal establishment information leaflets and live translations available through our Contact Centre. Field force staff will also carry language ID cards to help them establish which language the householder speaks if their first language is not English. This will be translated into the top 24 community languages signposting where respondents can get assistance. The Contact Centre will have a live interpretation service covering over 200 languages. Translated questionnaire guidance will be available in the top 16 community languages, providing approximately 90% coverage.

Both British Sign Language and Scottish Gaelic will be supported by the provision of an online translated questionnaire and associated content.

It should be noted, however, that, in common with previous censuses, Scotland's 2022 Census can only be completed in English and Gaelic.

Collection of data in relation to Scottish Gaelic supports action to meet obligations under the European Charter for Regional and Minority Languages (ECRML) and the Framework Convention for the Protection of National Minorities (FCPNM). Both of these are Council of Europe treaties ratified by the UK.

## **7. Conclusion**

The census is the official count of every person and household in Scotland. It is usually held every ten years and provides the most complete statistical picture of the nation available. It also provides information that central and local government need to develop policies and to plan and run public services. Statistical data processing, and the methodology underpinning it, will seek to ensure that all characteristics captured by the census are processed appropriately and consistently to meet the identified user needs best, and are considered throughout the data lifecycle.

It is also important to note that all of the published statistical outputs will be anonymised. This is achieved using Statistical Disclosure Control which is a process that manipulates record-level data to ensure that no individual can be identified from census outputs with any degree of confidence.

Scotland's Census 2022 is anticipated to support many human and civil rights indirectly through the principal output and benefit of the census, which is the production of a rich source of high-quality statistical population estimates which describe the number, characteristics and condition of Scotland's population.

Any interference with Articles 8 and 9 of the Human Rights Act 1998 is lawful because there is legal authority under the Census Act 1920 and is a proportionate means of pursuing one or more of the aims stated in the Article.

This is also balanced by the positive impact on Article 14.

NRS recognises that criminal sanction for non-completion of the census questionnaire is a significant human rights impact, and potentially engages Articles 8, 9, 10 and 14 of ECHR. Criminal sanction is considered proportionate and justified in light of the public policy importance of achieving an accurate and comprehensive census result.

The over-arching view is that Scotland's Census 2022 is compatible with the ECHR and other international rights laws and frameworks.

NRS will continuously monitor the human right impacts and update this assessment on a regular basis throughout the 2022 Census process to take account of any perceived changes in advance of and beyond the live census.