

# NHS Greater Glasgow and Clyde Equality Impact Assessment Tool

Equality Impact Assessment is a legal requirement as set out in the Equality Act (2010) and the Equality Act 2010 (Specific Duties)(Scotland) regulations 2012 and may be used as evidence for cases referred for further investigation for compliance issues. Evidence returned should also align to Specific Outcomes as stated in your local Equality Outcomes Report. Please note that prior to starting an EQIA all Lead Reviewers are required to attend a Lead Reviewer training session or arrange to meet with a member of the Equality and Human Rights Team to discuss the process. Please contact Equality@ggc.scot.nhs.uk for further details or call 0141 2014560.

Name of Policy/Service Review/Service Development/Service Redesign/New Service:

Who is the lead reviewer and when did they attend Lead reviewer Training? (Please note the lead reviewer must be someone in a position to authorise any actions identified as a result of the EQIA)

Name:	Date of Lead Reviewer Training:
Elaine Love	

Please list the staff involved in carrying out this EQIA

(Where non-NHS staff are involved e.g. third sector reps or patients, please record their organisation or reason for inclusion):

		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
1.	What equalities information is routinely collected from people currently using the service or affected by the policy? If this is a new service proposal what data do you have on proposed service user groups. Please note any barriers to collecting this data in your submitted evidence and an explanation for any protected characteristic data omitted.	A sexual health service collects service user data covering all 9 protected characteristics to enable them to monitor patterns of use.	Staff applying the policy will have access to all mainstream patient data sources – primarily TrakCare and any additional information captured within electronic notes. Typically this information will relate to the person's age, sex, race and any additional support needs they may have.	
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
2.	Please provide details of how data captured has been/will be used to inform policy content or service design. Your evidence should show which of the 3 parts of the	A physical activity programme for people with long term conditions reviewed service user data and found very low uptake by BME (Black and Minority Ethnic) people. Engagement	Available patient information will help provide a person-centred approach to any interventions where the policy is required. For instance additional communication support may be required across the protection pathway to ensure an individual is not reliant upon family members or carers to provide this.	

	General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics. 4) Not applicable	activity found promotional material for the interventions was not representative. As a result an adapted range of materials were introduced with ongoing monitoring of uptake. (Due regard promoting equality of opportunity)		
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
3.	How have you applied learning from research evidence about the experience of equality groups to the service or Policy? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation	Looked after and accommodated care services reviewed a range of research evidence to help promote a more inclusive care environment. Research suggested that young LGBT+ people had a disproportionately difficult time through exposure to bullying and harassment. As a result staff were trained in LGBT+ issues and were more confident in asking related questions to	The Policy and Strategy have been closely informed and aligned to National Guidance for Child Protection in Scotland (2021), Adult Support and Protection (Scotland) Act 2007 and the NHS Scotland Accountability Framework for Public Protection 2022. Beyond this, the policy and strategy aligned to The UN Convention on the Rights of the Child (1989). The Human Rights Act (1998) The Data Protection Act (2018) The General Data Protection Regulations (2016) Professional Codes of Conduct (GMC/NMC/HCPC) Children and Young Persons Act 2014 GIRFEC Datix Data (incident reporting system used in NHSGGC)	

	opportunity3) Foster good relations between protected characteristics4) Not applicable	young people. (Due regard to removing discrimination, harassment and victimisation and fostering good relations).	Staff engagement	
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
4.	Can you give details of how you have engaged with equality groups with regard to the service review or policy development? What did this engagement tell you about user experience and how was this information used? The Patient Experience and Public Involvement team (PEPI) support NHSGGC to listen and understand what matters to people and can offer support. Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation	A money advice service spoke to lone parents (predominantly women) to better understand barriers to accessing the service. Feedback included concerns about waiting times at the drop in service, made more difficult due to child care issues. As a result the service introduced a home visit and telephone service which significantly increased uptake. (Due regard to promoting equality of opportunity) * The Child Poverty (Scotland) Act 2017 requires organisations to take actions to reduce poverty for children in	The Strategy and Policy documents are led by the national legislative position (including national guidance in the form of Child Protection in Scotland Guidance (2021)) which considered a comprehensive inclusion of participation by children and young people in determining content. Feedback on the strategy and policy were received from key stakeholders within the organisation.	

	<ul> <li>2) Promote equality of opportunity</li> <li>3) Foster good relations between protected characteristics</li> <li>4) Not applicable </li> </ul>	households at risk of low incomes.		
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
5.	Is your service physically accessible to everyone? If this is a policy that impacts on movement of service users through areas are there potential barriers that need to be addressed? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation	An access audit of an outpatient physiotherapy department found that users were required to negotiate 2 sets of heavy manual pull doors to access the service. A request was placed to have the doors retained by magnets that could deactivate in the event of a fire. (Due regard to remove discrimination, harassment and victimisation).	When considering the strategy and applying the policy, staff will do so in a way that is underpinned by a person-centred ethos and take into consideration any and all factors that may impede an individual from benefiting equitably from the protections afforded by the Strategy and Policy. The policy will be applied in all patient settings.	

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		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
or po ensui discri comn users Your which Gene consi boxes 1) Re haras victin 2) Pro oppol 3) Fos betwe chara 4) No	will the service change licy development re it does not iminate in the way it nunicates with service s and staff? evidence should show h of the 3 parts of the eral Duty have been idered (tick relevant s). move discrimination, ssment and nisation omote equality of rtunity ster good relations een protected acteristics t applicable British Sign Language	Following a service review, an information video to explain new procedures was hosted on the organisation's YouTube site. This was accompanied by a BSL signer to explain service changes to Deaf service users. Written materials were offered in other languages and formats. (Due regard to remove discrimination, harassment and victimisation and promote equality of opportunity).	NHSGGC has invested in a robust interpreting and translation service framework. Anyone requiring communication support will have information provided in another language and be offered either a face to face interpreter or telephone/video interpreting support. Our commitments in this regard are set out in NHSGGC's Interpreting and Clear to All Policies. Where an individual has been assessed as being at risk of harm and requires communication support, the appropriate policy provisions will be applied, meaning a trained and independent (not associated to the vulnerable individual) interpreter will be provided.	

	(Scotland) Act 2017 aims to raise awareness of British Sign Language and improve access to services for those using the language. Specific attention should be paid in your evidence to show how the service review or policy has taken note of this.		
7	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(a)	Age Could the service design or policy content have a disproportionate impact on people due to differences in age? (Consider any age cut-offs that exist in the service design or policy content. You will need to objectively justify in the evidence section any segregation on the grounds of age promoted by the policy or included in the service design). Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics.	There is no risk associated with age in the understanding of the Strategy or application of the policy. Both documents cover the entire life course, underpinned by the understanding that protections are afforded for unborn babies, children, young people and vulnerable adults.	

	4) Not applicable		
(b)	<ul> <li>Disability</li> <li>Could the service design or policy content have a disproportionate impact on people due to the protected characteristic of disability?</li> <li>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</li> <li>1) Remove discrimination, harassment and victimisation</li> <li>2) Promote equality of opportunity</li> <li>3) Foster good relations between protected characteristics.</li> <li>4) Not applicable</li> </ul>	While disability may be linked with greater likelihood of being made vulnerable through the actions of others and broader of experience of discrimination within services, the Strategy and Policy do not compound this experience. A well-considered Strategy position and Policy approach will enhance the protections required for some disabled people and ensure a robust response to need is delivered. NHSGGC will work to support the equitable inclusion of disabled people and will sow due regard to our anticipatory duty to make all reasonable adjustments required. In relation to the Policy this will include the requirement to provide additional communication support and liaison with carers etc where necessary.	
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(c)	Gender Reassignment Could the service change or policy have a disproportionate impact on people with the protected characteristic of Gender Reassignment? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).	<ul> <li>While trans people may be at greater risk of being made vulnerable due to societal attitudes and experience of discrimination within some services, the strategy and policy will not compound this experience.</li> <li>A well-considered Strategy position and Policy approach will enhance the protections required for some trans people and ensure a robust response to</li> </ul>	

	<ul> <li>1) Remove discrimination, harassment and victimisation</li> <li>2) Promote equality of opportunity</li> <li>3) Foster good relations between protected characteristics</li> <li>4) Not applicable</li> </ul>	need is delivered. The Public Protection Policy will be considered alongside the NHSGGC Trans Policy, ensuring that people with the protected characteristic of gender reassignment receive person-centred care that is trans inclusive.	
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(d)	Marriage and Civil Partnership	Not relevant	
	Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Marriage and Civil Partnership?		
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).		
	1) Remove discrimination, harassment and victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected characteristics		
	4) Not applicable		

(e)	Pregnancy and Maternity	The policy promotes the protection of rights across	
	Could the service change or policy have a	the life course, including safeguarding unborn babies. In terms of vulnerable adults, pregnancy is	
	disproportionate impact on the people with the	understood to be a period during which women are	
	protected characteristics of Pregnancy and Maternity?	at increased risk of gender based violence and the	
		Public Protection Policy will be considered alongside	
	Your evidence should show which of the 3 parts of the	NHSGGC's Gender Based Violence Policy and	
	General Duty have been considered (tick relevant boxes).	mainstream enquiry practice to ensure women have equitable rights to the protections available.	
	1) Remove discrimination, harassment and victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected		
	characteristics.		
	4) Not applicable		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(f)	Race	There is no anticipated negative impact on the	
		grounds of race. The Policy will work alongside	
	Could the service change or policy have a	existing mainstream resources and policies (e.g.	
	disproportionate impact on people with the protected characteristics of Race?	Interpreting Policy & Clear to All Policy) to ensure people with the protected characteristic of Race are	
		afforded equality of opportunity to benefit from the	
	Your evidence should show which of the 3 parts of the	protections set out.	
	General Duty have been considered (tick relevant		
	boxes).	As is the case with anyone requiring communication	
	1) Demonse discrimination, komponent and	support, this will be delivered through a qualified	
	1) Remove discrimination, harassment and victimisation	language interpreter and will remove the reliance on	
		communication support provided by someone known	
	2) Promote equality of opportunity	to the vulnerable person. Where a vulnerable prefers not to be supported by someone on a face to	

	3) Foster good relations between protected	face basis, there would be an option to provide	
	characteristics	telephone interpreting (spoken) or video link (BSL).	
		······································	
	4) Not applicable		
(g)	Religion and Belief	Any person at risk of harm and requiring recourse to	
-		provision set out in the strategic approach or	
	Could the service change or policy have a	operational policy will have added support via the	
	disproportionate impact on the people with the	Board's Spiritual Care Team. There may be	
	protected characteristic of Religion and Belief?	occasions where actions considered to be part of a	
		community's faith and belief practice require	
	Your evidence should show which of the 3 parts of the	immediate intervention by NHSGGC Teams. For	
	General Duty have been considered (tick relevant	instance, female genital mutilation may be disclosed	
	boxes).	and will require application of protection measures if	
	1) Demons discrimination between tand	the woman in questions is perceived to be at	
	1) Remove discrimination, harassment and victimisation	continued risk.	
	2) Promote equality of opportunity		
	,		
	3) Foster good relations between protected		
	characteristics.		
	4) Not applicable		
	Protected Characteristic	Service Evidence Provided	Descible pegative impact and
			Possible negative impact and Additional Mitigating Action
			Required
(h)	Sex	A clear strategic position and policy which sets out	Nequileu
		the role and process for NSHGGC in providing a	
	Could the service change or policy have a	robust public protection intervention will benefit	
	disproportionate impact on the people with the	women and men at risk who access our services.	
	protected characteristic of Sex?		
		Societally, women are at greater risk of violence in	
	Your evidence should show which of the 3 parts of the	all most than men. The policy will work alongside	
	General Duty have been considered (tick relevant	NHSGGC's Gender Based Violence (GBV) Policy	
	boxes).	and enhanced frontline routine enquiry to ensure	

1) Remove discrimination, harassment and victimisation	women have equitable access to the protections available.	
2) Promote equality of opportunity		
3) Foster good relations between protected characteristics.	A clear strategic position and policy which sets out the role and process for NSHGGC in providing a robust public protection intervention will benefit women and men at risk who access our services.	
4) Not applicable	In Scotland, men are more likely to be a victim of violence than women, however there is a distinct patterning by gender and type of crime, principally between sexual crimes and non-sexual crimes of violence.	
	Where gender information was recorded, around four-in-five (81%) incidents of domestic abuse in 2021-22 involved a female victim and a male suspected perpetrator. 15% of domestic abuse incidents involved a male victim and a female suspected perpetrator. The 31 to 35 years old age group had the highest incident rate for both victims and suspected perpetrators. 89% of all domestic abuse incidents occurred in a home or dwelling. (Domestic abuse: statistics recorded by the police in Scotland - 2021/22 - gov.scot (www.gov.scot))	
	In <u>national case reviews analysed by NSPCC</u> (2020), practitioners did not always view physical abuse by a woman against a man as a crime. Some men also held this view and therefore did not see themselves as victims of domestic abuse. Being alert to domestic abuse is critical to ensure that risk is not overlooked or underestimated.	
	The <u>Hospital Navigator Service</u> interrupts violence by supporting people experiencing violence who	

		present within an Emergency Department (ED) or hospital ward. Assurance of GBV programmes of work is reported to NHSGGC's Public Protection Forum, including policy/guidance development, identification of risk through sensitive routine enquiry into experience of GBV, and CPD opportunities for staff.	
(i)	Sexual Orientation         Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sexual Orientation?         Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).         1) Remove discrimination, harassment and victimisation         2) Promote equality of opportunity         3) Foster good relations between protected characteristics.         4) Not applicable	There is no perceived negative impact on people on the grounds of their sexual orientation. NHSGGC aims to provide services that are perceived as safe and inclusive by LGB people. Almost 25% of NHSGGC's workforce have signed NHS Scotland's Pride Pledge and wear the rainbow badge identifying them as an ally for LGBTQ+ people.	
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required

(j)	Socio – Economic Status & Social Class	There is no perceived deficit to people who may experience economic exclusion.	
	Could the proposed service change or policy have a		
	disproportionate impact on people because of their		
	social class or experience of poverty and what		
	mitigating action have you taken/planned?		
	The Fairer Scotland Duty (2018) places a duty on public		
	bodies in Scotland to actively consider how they can		
	reduce inequalities of outcome caused by		
	socioeconomic disadvantage when making strategic		
	decisions. If relevant, you should evidence here what		
	steps have been taken to assess and mitigate risk of		
	exacerbating inequality on the ground of socio-		
	economic status. Additional information available		
	here: Fairer Scotland Duty: guidance for public bodies		
	<u>- gov.scot (www.gov.scot)</u>		
	Seven useful questions to consider when seeking to		
	demonstrate 'due regard' in relation to the Duty:		
	1. What evidence has been considered in preparing		
	for the decision, and are there any gaps in the		
	evidence?		
	2. What are the voices of people and communities		
	telling us, and how has this been determined		
	(particularly those with lived experience of socio-		
	economic disadvantage)?		
	3. What does the evidence suggest about the actual or		
	likely impacts of different options or measures on		
	inequalities of outcome that are associated with socio-		
	economic disadvantage?		
	4. Are some communities of interest or communities		
	of place more affected by disadvantage in this case		
	than others?		
	5. What does our Duty assessment tell us about socio-		
	economic disadvantage experienced		
	disproportionately according to sex, race, disability		

	and other protected characteristics that we may need		
	to factor into our decisions?		
	6. How has the evidence been weighed up in reaching		
	our final decision?		
	7. What plans are in place to monitor or evaluate the		
	impact of the proposals on inequalities of outcome		
	that are associated with socio-economic		
	disadvantage? 'Making Fair Financial Decisions'		
	(EHRC, 2019)21 provides useful information about		
	the 'Brown Principles' which can be used to		
	determine whether due regard has been given. When		
	engaging with communities the National Standards		
	for Community Engagement22 should be followed.		
	Those engaged with should also be advised		
	subsequently on how their contributions were factored		
	into the final decision.		
(k)	Other marginalised groups	The Strategy and Policy will ensure a person-centred	
		approach to assessment and instigation of public	
	How have you considered the specific impact on other	protection measures. To this end all people coming	
	groups including homeless people, prisoners and ex-	into NHSGGC will benefit from the resource invested	
	offenders, ex-service personnel, people with	in this work.	
	addictions, people involved in prostitution, asylum		
	seekers & refugees and travellers?		
8.	Does the service change or policy development include	Not applicable	
	an element of cost savings? How have you managed		
	this in a way that will not disproportionately impact on		
	protected characteristic groups?		
	Your evidence should show which of the 3 parts of the		
	General Duty have been considered (tick relevant		
	boxes).		
	1) Remove discrimination, harassment and		
	victimisation		
	2) Promote equality of opportunity		

	<ul> <li>3) Foster good relations between protected characteristics.</li> <li>4) Not applicable</li> </ul>		
9.	What investment in learning has been made to prevent	Service Evidence Provided Completion of the Board's Statutory and Mandatory e-learning	Possible negative impact and Additional Mitigating Action Required
	discrimination, promote equality of opportunity and foster good relations between protected characteristic groups? As a minimum include recorded completion rates of statutory and mandatory learning programmes (or local equivalent) covering equality, diversity and human rights.	module sits at 86%. In addition to the module staff will undertake additional role-specific learning that will enhance the person-centred response to any public protection issues.	

10. In addition to understanding and responding to legal responsibilities set out in Equality Act (2010), services must pay due regard to ensure a person's human rights are protected in all aspects of health and social care provision. This may be more obvious in some areas than others. For instance, mental health inpatient care or older people's residential care may be considered higher risk in terms of potential human rights breach due to potential removal of liberty, seclusion or application of restraint. However risk may also involve fundamental gaps like not providing access to communication support, not involving patients/service users in decisions relating to their care, making decisions that infringe the rights of carers to participate in society or not respecting someone's right to dignity or privacy.

The Human Rights Act sets out rights in a series of articles – right to Life, right to freedom from torture and inhumane and degrading treatment, freedom from slavery and forced labour, right to liberty and security, right to a fair trial, no punishment without law, right to respect for private and family life, right to freedom of thought, belief and religion, right to freedom of expression, right to freedom of assembly and association, right to marry, right to protection from discrimination.

Please explain in the field below if any risks in relation to the service design or policy were identified which could impact on the human rights of patients, service users or staff.

A human rights ethos sits at the heart of the strategic and policy position. Everyone should be able to enjoy the right to be free from avoidable harm, a principle that underpins this work.

Please explain in the field below any human rights based approaches undertaken to better understand rights and responsibilities resulting from the service or policy development and what measures have been taken as a result e.g. applying the PANEL Principles to maximise Participation, Accountability, Non-discrimination and Equality, Empowerment and Legality or FAIR\*.

The local strategy and policy follows a national direction in terms of design/focus and benefits from the valuable insights made by the Scottish Government when engaging with a broad range of stakeholders.

- Facts: What is the experience of the individuals involved and what are the important facts to understand?
- Analyse rights: Develop an analysis of the human rights at stake
- Identify responsibilities: Identify what needs to be done and who is responsible for doing it
- Review actions: Make recommendations for action and later recall and evaluate what has happened as a result.

Having completed the EQIA template, please tick which option you (Lead Reviewer) perceive best reflects the findings of the assessment. This can be cross-checked via the Quality Assurance process:



Option 1: No major change (where no impact or potential for improvement is found, no action is required)

Option 2: Adjust (where a potential or actual negative impact or potential for a more positive impact is found, make changes to mitigate risks or make improvements)

Option 3: Continue (where a potential or actual negative impact or potential for a more positive impact is found but a decision not to make a change can be objectively justified, continue without making changes)

Option 4: Stop and remove (where a serious risk of negative impact is found, the plans, policies etc. being assessed should be halted until these issues can be addressed)

11. If you believe your service is doing something that 'stands out' as an example of good practice - for instance you are routinely collecting patient data on sexual orientation, faith etc. - please use the box below to describe the activity and the benefits this has brought to the service. This information will help others consider opportunities for developments in their own services.

Actions – from the additional mitigating action requirements boxes completed above, please summarise the actions this service will be taking forward.	Date for completion	Who is responsible?(initials)

### Ongoing 6 Monthly Review please write your 6 monthly EQIA review date:

Lead Reviewer: EQIA Sign Off:	Name Job Title Signature Date	Deirdre McCormick Chief Nurse – Head of Service – Public Protection Deirdre M <sup>e</sup> Conside 12/07/23
Quality Assurance Sign Off:	Name Job Title Signature Date	Alastair Low Planning Manager 12/07/2023



#### NHS GREATER GLASGOW AND CLYDE EQUALITY IMPACT ASSESSMENT TOOL MEETING THE NEEDS OF DIVERSE COMMUNITIES 6 MONTHLY REVIEW SHEET

Name of Policy/Current Service/Service Development/Service Redesign:

## Please detail activity undertaken with regard to actions highlighted in the original EQIA for this Service/Policy

	Comp	oleted
	Date	Initials
Action:		
Status:		
Action:		
Status:		
Action:		
Status:		
Action:		
Status:		

Please detail any outstanding activity with regard to required actions highlighted in the original EQIA process for this Service/Policy and reason for non-completion

	To be Cor	To be Completed by	
	Date	Initials	
Action:			
Reason:			
Action:			
Reason:			

#### Please detail any new actions required since completing the original EQIA and reasons:

	To be con	To be completed by	
	Date	Initials	
Action:			
Reason:			
Action:			
Reason:			

Please detail any discontinued actions that were originally planned and reasons:

Action:	
Reason:	
Action:	
Reason:	

Please write your next 6-month review date

Name of completing officer:

Date submitted:

If you would like to have your 6 month report reviewed by a Quality Assuror please e-mail to: <u>alastair.low@ggc.scot.nhs.uk</u>