

## 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. Please refer to the EQIA Guidance Document while completing this form. 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 [CITAdminTeam@ggc.scot.nhs.uk](mailto:CITAdminTeam@ggc.scot.nhs.uk) for further details or call 0141 2014560.

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

Policy for Managing Significant Adverse Events (clinical)

Is this a: Current Service  Service Development  Service Redesign  New Service  New Policy  Policy Review

### Description of the service & rationale for selection for EQIA: (Please state if this is part of a Board-wide service or is locally driven).

*What does the service or policy do/aim to achieve? Please give as much information as you can, remembering that this document will be published in the public domain and should promote transparency.*

The NHSGGC Policy for Managing Significant Adverse Events (clinical) is a key organizational policy, which aims to ensure that clinical adverse events and near-misses are reported and reviewed in a timely and effective way, in partnership with patients, carers, families and staff; and that learning from reviews is identified, shared and used to inform improvements to services. The main aims of this policy are:

- Clinical adverse events and near-misses are reported and managed in a timely and effective manner in partnership with patients, carers, families and staff
- All people, including staff who are involved in an adverse event are offered support, at a time and in a way which meets their needs
- Feedback is given to staff and will inform decision-making
- Learning from adverse events is identified and used to inform service improvements, that enhance the safety and quality of healthcare provided
- Learning is shared both within and out with NHSGGC to provide opportunities for improvement
- NHSGGC complies with its legal duties in respect of adverse events, including compliance with the statutory organisational Duty of Candour requirements where applicable

*Why was this service or policy selected for EQIA? Where does it link to organisational priorities? (If no link, please provide evidence of proportionality, relevance, potential legal risk etc.)*

The NHSGGC Policy for Managing Significant Adverse Events (clinical) is written at a strategic level, recognising that implementation and practice will be supplemented by supporting guidance and other relevant policies.

It is proportionate that the policy is robustly assessed for consideration of any potential negative impact on protected characteristics, which aligns to our commitment to eliminate discrimination, harassment and victimisation, promote equality of opportunity and foster good relations between groups that share a protected characteristic and those who do not.

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: Paula Spaven Director of Clinical and Care Governance	Date of Lead Reviewer Training:
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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):

Director of Clinical and Care Governance Clinical Risk Managers
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	<i>Example</i>	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
1. <b>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.</b>	<b><i>A sexual health service collects service user data covering all 9 protected characteristics to enable them to monitor patterns of use.</i></b>	A Significant Adverse Event (SAE) investigation collects a range of relevant information through the reporting system and review process.  The SAE report template includes a question on whether an Equality Factor Contributed to the Event, which will enhance the collection of equalities information on people affected by the policy.	
	<i>Example</i>	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required

<p>2. Please provide details of how data captured has been/will be used to inform policy content or service design.</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations <input type="checkbox"/> between protected characteristics.</p> <p>4) Not applicable <input type="checkbox"/></p>	<p><i>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 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)</i></p> <p>Review of patient data is an important aspect of understanding how policy implementation may be patterned by protected characteristic groups. To this end, capture of population demographic data when reporting and reviewing adverse events, and potential consideration of the data through an 'equality lens' will help define any areas for improvement.</p> <p>The policy specifically states that all people, including staff who are involved in an adverse event, are offered support, at a time and in a way which meets their needs</p>
<p>3. How have you applied learning from research evidence about the experience of equality groups to the service or Policy?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been</p>	<p><i>Example</i></p> <p><i>Service Evidence Provided</i></p> <p><i>Possible negative impact and Additional Mitigating Action Required</i></p> <p>The NHSGGC Policy for Managing Significant Adverse Events relies on the effective use of supporting NHSGGC policies in areas where there may be a need to actively consider potential detriment experienced by protected characteristic groups.</p> <p>These supporting policies have been extensively consulted on with equality groups. For instance, informing and involving patients and families is a core element of policy and will be directed by effective use of the Clear to All Policy and Interpreting Policy.</p>

	<p>considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p><i>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 young people. (Due regard to removing discrimination, harassment and victimisation and fostering good relations).</i></p>		
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
4.	<p>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?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p>	<p><i>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.</i></p>	<p>The Policy is not a patient-facing document , but will be implemented in services that are required to show due regard to meeting the Public Sector Equality Duty and respond to local evidence of possible variations in service uptake by protected characteristic groups (Specific Outcomes), or in the process of reviewing adverse events.</p> <p>The policy has been consulted on across NHSGGC for comment, bringing into consideration past experience and best practice.</p>	

	<p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <p>4) Not applicable <input checked="" type="checkbox"/></p>	<p><i>(Due regard to promoting equality of opportunity)</i></p> <p><i>* The Child Poverty (Scotland) Act 2017 requires organisations to take actions to reduce poverty for children in households at risk of low incomes.</i></p>	
	<b>Example</b>	<b>Service Evidence Provided</b>	<b>Possible negative impact and Additional Mitigating Action Required</b>
5.	<p>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?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p>	<p><i>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.</i></p> <p><i>(Due regard to remove discrimination, harassment and victimisation).</i></p>	<p>Not applicable</p>

	<p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>		
	<i>Example</i>	<b>Service Evidence Provided</b>	<b>Possible negative impact and Additional Mitigating Action Required</b>
6.	<p><b>How will the service change or policy development ensure it does not discriminate in the way it communicates with service users and staff?</b></p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p>	<p><i>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.</i></p> <p><i>Written materials were offered in other languages and formats.</i></p> <p><i>(Due regard to remove discrimination, harassment and victimisation and promote equality of</i></p>	Communicating effectively with patients and/or their families is an essential part of the process when dealing with a clinical adverse event. The process will utilise existing NHSGGC policies to ensure proportionate steps are taken to remove any barriers to full and meaningful engagement, such as the need for interpreter service and advocacy services, and consideration of special cultural needs

	<p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p> <p>The British Sign Language (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.</p>		
7	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(a)	<p><b>Age</b></p> <p>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).</p>	<p>Given the high level and strategic nature of the policy, it is unlikely to have an impact on the protected characteristic of age. Any relevance to age will be captured within the review process and considered alongside any relevant organisational policies.</p>	

	<p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation</p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p>		
(b)	<p><b>Disability</b></p> <p>Could the service design or policy content have a disproportionate impact on people due to the protected characteristic of disability?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity</p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>Given the high level and strategic nature of the policy, it is unlikely to have an impact on the protected characteristic of disability. Any relevance to disability will be captured within the review process and considered alongside any relevant organisational policies.</p>	
	<b>Protected Characteristic</b>	<b>Service Evidence Provided</b>	<b>Possible negative impact and Additional Mitigating Action Required</b>

<p><b>(c) Gender Identity</b></p> <p><b>Could the service change or policy have a disproportionate impact on people with the protected characteristic of gender identity?</b></p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>Given the high level and strategic nature of the policy, it is unlikely to have an impact on the protected characteristic of gender identity. Any relevance to gender identity will be captured within the review process and considered alongside any relevant organisational policies, and legal protections afforded to transsexual people.</p>	
Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
<p><b>(d) Marriage and Civil Partnership</b></p> <p><b>Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Marriage and Civil Partnership?</b></p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p>	<p>Given the high level and strategic nature of the policy, it is unlikely to have an impact on the protected characteristic of marriage and civil partnership. Any relevance to marriage and civil partnership will be captured within the review process and considered alongside any relevant organisational policies</p>	

	<p>1) Remove discrimination, harassment and victimisation      <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity      <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics      <input type="checkbox"/></p> <p>4) Not applicable      <input type="checkbox"/></p>		
(e)	<p><b>Pregnancy and Maternity</b></p> <p><b>Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Pregnancy and Maternity?</b></p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation      <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity      <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics.      <input type="checkbox"/></p> <p>4) Not applicable      <input type="checkbox"/></p>	<p>Given the high level and strategic nature of the policy, it is unlikely to have an impact on the protected characteristic of pregnancy and maternity. Any relevance to pregnancy and maternity will be captured within the review process and considered alongside any relevant organisational policies</p>	
	<b>Protected Characteristic</b>	<b>Service Evidence Provided</b>	<b>Possible negative impact and Additional Mitigating Action Required</b>

<p><b>(f) Race</b></p> <p><b>Could the service change or policy have a disproportionate impact on people with the protected characteristics of Race?</b></p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation      <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity      <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics      <input type="checkbox"/></p> <p>4) Not applicable      <input type="checkbox"/></p>	<p>Given the high level and strategic nature of the policy, it is unlikely to have an impact on the protected characteristic of race. Any relevance to race will be captured within the review process and considered alongside any relevant organisational policies</p> <p>The policy aims to ensure effective involvement of patients, family and carers who may require communication support to engage fully with the review process. This would extend to use of spoken language interpreters and timely translation of all relevant documentation into appropriate languages.</p>
<p><b>(g) Religion and Belief</b></p> <p><b>Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Religion and Belief?</b></p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation      <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity      <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics.      <input type="checkbox"/></p>	<p>Given the high level and strategic nature of the policy, it is unlikely to have an impact on the protected characteristic of religion and belief. Any relevance to religion and belief will be captured within the review process and considered alongside any relevant organisational policies</p>

	4) Not applicable <input type="checkbox"/>		
	<b>Protected Characteristic</b>	<b>Service Evidence Provided</b>	<b>Possible negative impact and Additional Mitigating Action Required</b>
(h)	<p><b>Sex</b></p> <p><b>Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sex?</b></p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	Given the high level and strategic nature of the policy, it is unlikely to have an impact on the protected characteristic of sex. Any relevance to sex will be captured within the review process and considered alongside any relevant organisational policies	
(i)	<p><b>Sexual Orientation</b></p> <p><b>Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sexual Orientation?</b></p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p>	Given the high level and strategic nature of the policy, it is unlikely to have an impact on the protected characteristic of sexual orientation. Any relevance to sexual orientation will be captured within the review process and considered alongside any relevant organisational policies	

	<p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>		
	<b>Protected Characteristic</b>	<b>Service Evidence Provided</b>	<b>Possible negative impact and Additional Mitigating Action Required</b>
(j)	<p><b>Socio – Economic Status &amp; Social Class</b></p> <p>Could the proposed service change or policy have a disproportionate impact on the people because of their social class or experience of poverty and what mitigating action have you taken/planned?</p> <p>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 in strategic planning. You should evidence here steps taken to assess and mitigate risk of exacerbating inequality on the ground of socio-economic status.</p>	Given the high level and strategic nature of the policy, it is unlikely to have an impact on the protected characteristic of socio-economic status and social class. Any relevance to socio-economic status and social class will be captured within the review process and considered alongside any relevant organisational policies	
(k)	<p><b>Other marginalised groups</b></p> <p>How have you considered the specific impact on other groups including homeless people, prisoners and ex-offenders, ex-service personnel, people with</p>	Given the high level and strategic nature of the policy, it is unlikely to have an impact on marginalised groups. Any relevance to marginalised groups will be captured within the review process and considered alongside any relevant organisational policies	

	addictions, people involved in prostitution, asylum seekers & refugees and travellers?		
8.	<p>Does the service change or policy development include an element of cost savings? How have you managed this in a way that will not disproportionately impact on protected characteristic groups?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input checked="" type="checkbox"/></p>	Not applicable.	

		Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
9.	What investment in learning has been made to prevent 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.	All NHSGGC staff are expected to complete their statutory and mandatory Equality and Human Rights e-learning module and any role specific learning and education.	

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.

The Policy sets out a robust process to review clinical adverse events. Any review process will be cognisant of the need to consider if and how an individual's rights might have been affected, and will include detailed assessment in the resulting reports.

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\* .

While the policy has not explicitly considered application of the PANEL principles, the basis of the policy is to ensure everyone connected to a Significant Adverse Event is afforded a fair and transparent process.

- 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.

Not applicable

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            Paula Spaven  
Job Title        Director of Clinical and Care Governance  
Signature  
Date            3<sup>rd</sup> December 2025

Quality Assurance Sign Off:

Name            Alastair Low  
Job Title        Planning and Development Manager, Equality and Human Rights Team  
Signature  
Date            17<sup>th</sup> February 2026

**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**

		Completed	
		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 Completed by	
		Date	Initials
Action:			
Reason:			
Action:			
Reason:			

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

		<b>To be completed by</b>	
		<b>Date</b>	<b>Initials</b>
<b>Action:</b>			
<b>Reason:</b>			
<b>Action:</b>			
<b>Reason:</b>			

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

<b>Action:</b>	
<b>Reason:</b>	
<b>Action:</b>	
<b>Reason:</b>	

**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: [alastair.low@ggc.scot.nhs.uk](mailto:alastair.low@ggc.scot.nhs.uk)