

## NHS Greater Glasgow and Clyde Equality Impact Assessment Tool

Equality Impact Assessment is a legal requirement as set out in 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:

 New Interventional Procedures Policy

 Is this a:
 Current Service

 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.

This policy sets out the approach to be taken over the introduction of new interventional procedures within NHSGGC and is

designed to enable clinicians to embrace new technologies whilst protecting patients and reducing risk.

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.). Consider any locally identified Specific Outcomes noted in your Equality Outcomes Report.

The original policy was subject to an EQIA. The policy is currently being reviewed alongside the original EQIA to ensure no unintended impact as a resulted of amendments made.

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

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):

Lorna Fairlie

Kirsty Proctor

		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	A sexual health service collects service user data covering all 9 protected characteristics to enable them to monitor patterns of use.	There is no direct relationship between equality monitoring data and the application of new interventional procedures. Any information relating to a patient's protected characteristics may be captured on clinical notes and could be reviewed in relation to	

	protected characteristic data omitted.		the specific service where the new interventional procedure is applied.	
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
2.	<ul> <li>Please provide details of how data captured has been/will be used to inform policy content or service design.</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 discriminatio harassment and victimisation</li> <li>2) Promote equality of opportunity</li> <li>3) Foster good relations between protected</li> </ul>	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)	As mentioned above, clinical notes containing pertinent patient information will be used in relation to the suitability (or otherwise) of a new interventional procedure. The policy itself is not impacted on by the demographics of NHSGGC and will be applied in situ as per the requirements of the Public Sector Equality Duty	

characteristics.			
4) Not applicable			
	Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
<ul> <li>How have you applied learning from research evidence about the experience of equality groups to the service or Policy?</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> </ul>	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 young people. (Due regard to removing discrimination, harassment and victimisation and fostering good relations).	Any new interventional procedure is subjected to robust assessment by the National Institute for Health and Care Excellence (NICE). NICE is subject to the same rigour in respect of compliance with the Equality Act and Public Sector Duty. This translates into equality- proofed NICE Interventional Procedure Guidance which directs health care practitioners in relation to the appropriate use of interventional procedures and what interventional procedures are appropriate for us.	

	4) Not applicable			
		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 households at risk of low incomes.	The development and testing of interventional procedures happens within a strict governance/ethics framework and ensures that where relevant, the experiences of different patient groups are captured. The policy itself is a resource to inform professional practice and does not require engagement with protected characteristic groups in order to deliver safe and effective practice within NHSGGC.	

	<ul> <li>opportunity</li> <li>3) Foster good relations between protected characteristics</li> <li>4) Not applicable</li> </ul>	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).	The Policy supports the effective application of new interventional procedures. The procedures will be appropriate and accessible to any patient who meets the clinical threshold for use. Where adjustments are required, these will be applied within specific settings.	

<ul> <li>3) Foster good relations between protected characteristics.</li> <li>4) Not applicable</li> </ul>			
	Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
<ul> <li>6. How will the service change or policy development ensure it does not discriminate in the way it communicates with service users and staff?</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</li> </ul>	<ul> <li>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.</li> <li>Written materials were offered in other languages and formats.</li> <li>(Due regard to remove discrimination, harassment and victimisation and promote equality of opportunity).</li> </ul>	The updated policy is staff-facing and will be communicated to the appropriate segments of the workforce through mainstream communication methods which are inclusive of any communication support needs staff may have.	

	characteristics 4) Not applicable 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.		
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). If this decision is likely to impact on children and young people (below the age of 18) you will need to	New interventional procedures bring improvements in patient care meaning that all protected characteristic groups will benefit from enhanced diagnostic and treatment options. Where procedures are applied, delivery will meet the requirements of the Equality Act and	No negative impact Positive impact: There is little evidence the policy will have an impact due to age.

	evidence how you have considered the General Principles of the United Nations Convention on the Rights of the Child. Please include this in Section 10 of the form. Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant	Public Sector Equality Duty and person centred care methodology will ensure that all patients receive bespoke support.	
	boxes).		
	1) Remove discrimination, harassment and victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected characteristics.		
	4) Not applicable		
(b)	Disability	New interventional	No negative impact
	Could the service design or policy content have a disproportionate impact on people due to the protected characteristic of disability?	procedures bring improvements in patient care meaning that all protected characteristic groups will benefit from	
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).	enhanced diagnostic and treatment options. Where procedures are applied, delivery will	
	1) Remove discrimination, harassment and victimisation	of the Equality Act and Public Sector Equality	

	<ul> <li>2) Promote equality of opportunity</li> <li>3) Foster good relations between protected characteristics.</li> <li>4) Not applicable</li> <li>Protected Characteristic</li> </ul>	Duty. In relation to disability this includes reasonable adjustments to meet any specific communication requirements or facilitate physical access. Service Evidence Provided	Possible negative impact and Additional Mitigating Action
(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).         1) Remove discrimination, harassment and         victimisation         2) Promote equality of opportunity         3) Foster good relations between protected         characteristics         4) Not applicable	New interventional procedures bring improvements in patient care meaning that all protected characteristic groups will benefit from enhanced diagnostic and treatment options. Where procedures are applied, delivery will meet the requirements of the Equality Act and Public Sector Equality Duty and person centred care methodology will ensure that all patients receive bespoke support. IN relation to Trans patients, this means	Required No negative impact

	Protected Characteristic	sensitively enquiring about possible trans history that may support the effective and safe use of interventional procedures. Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(d)	Marriage and Civil Partnership         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	There is no correlation between the subject of the policy and the protected characteristic of Marriage and Civil Partnership.	No negative impact

(e)	Pregnancy and Maternity	New interventional	No negative impact
		procedures bring	
	Could the service change or policy have a	improvements in patient	
	disproportionate impact on the people with the	care meaning that all	
	protected characteristics of Pregnancy and Maternity?	protected characteristic	
		groups will benefit from	
	Your evidence should show which of the 3 parts of the	enhanced diagnostic	
	General Duty have been considered (tick relevant	and treatment options.	
	boxes).	Where procedures are	
	1) Demons discrimination because and	applied, delivery will	
	1) Remove discrimination, harassment and victimisation	meet the requirements	
		of the Equality Act and	
	2) Promote equality of opportunity	Public Sector Equality	
		Duty and person centred care	
	3) Foster good relations between protected		
	characteristics.	methodology will ensure that all patients receive	
		bespoke support.	
	4) Not applicable		
		There is no direct	
		relationship between the	
		policy and the protected	
		characteristic of	
		pregnancy or maternity.	
	Protected Characteristic	Service Evidence Provided	Possible negative impact and
			Additional Mitigating Action
10	-		Required
(f)	Race	New interventional	No negative impact
		procedures bring	
	Could the service change or policy have a	improvements in patient	
	disproportionate impact on people with the protected	care meaning that all	

0	characteristics of Race?	protected characteristic
,	Your ovidopco should show which of the 2 parts of the	groups will benefit from
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant	enhanced diagnostic and treatment options.
	boxes).	Where procedures are
<b></b>	bures).	applied, delivery will
-	1) Remove discrimination, harassment and	meet the requirements
	victimisation	of the Equality Act and
		Public Sector Equality
2	2) Promote equality of opportunity	Duty and person
		centred care
	3) Foster good relations between protected	methodology will ensure
0	characteristics	that all patients receive
	· · · · · · · · · · · · · · · · · · ·	bespoke support.
4	4) Not applicable	
		In relation to the
		protected characteristic
		of race, the policy will be
		applied alongside
		existing NHSGGC
		policies that support
		access to services for
		people who do not have
		English as a first
		language. Any service-
		specific information
		relating to the
		interventional procedure
		will be made available in
		other languages and
		interpreters will be

		available during any	
		attendance.	
(g)	Religion and Belief         Could the service change or policy have a         disproportionate impact on the people with the         protected characteristic of Religion and Belief?         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	New interventional procedures bring improvements in patient care meaning that all protected characteristic groups will benefit from enhanced diagnostic and treatment options. Where procedures are applied, delivery will meet the requirements of the Equality Act and Public Sector Equality Duty and person	No negative impact
	<ul> <li>3) Foster good relations between protected characteristics.</li> <li>4) Not applicable</li> </ul>	centred care methodology will ensure that all patients receive bespoke support.	
		There is no direct relationship between the policy and the protected characteristics of religion or belief.	
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(h)	Sex	New interventional procedures bring	No negative impact envisaged

	Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sex? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment a victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics.	improvements in patient care meaning that all protected characteristic groups will benefit from enhanced diagnostic and treatment options. Where procedures are applied, delivery will meet the requirements of the Equality Act and Public Sector Equality Duty and person centred care methodology will ensure that all patients receive bespoke support. Any procedures that are sex specific will ensure that appropriate sensitivities are in place and that staff are aware of NHSGGC's Gender Based Violence Policy and associated legislation.	Positive impact: Men and women will be treated equally under the terms of the policy.
(i)	Sexual Orientation Could the service change or policy have a	New interventional procedures bring improvements in patient	No negative impact
	disproportionate impact on the people with the protected characteristic of Sexual Orientation?	care meaning that all protected characteristic	

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	groups will benefit from enhanced diagnostic and treatment options. Where procedures are applied, delivery will meet the requirements of the Equality Act and Public Sector Equality Duty and person centred care methodology will ensure that all patients receive bespoke support. There is no direct relationship between the policy and the protected characteristic of sexual orientation,	Descible pogative impact and
Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required

(j)	Socio – Economic Status & Social Class 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? In addition to the above, if this constitutes a 'strategic decision' you should evidence due regard to meeting the requirements of the Fairer Scotland Duty (2018). Public bodies in Scotland must actively consider how they can reduce inequalities of outcome caused by socioeconomic disadvantage when making <u>strategic</u> decisions and complete a separate assessment. Additional information available here: <u>Fairer Scotland</u> <u>Duty: guidance for public bodies - gov.scot</u>	No negative impact found in relation to socio-economic status. Delivery of health care interventions will be free at the point of delivery. Where access (transport) is impeded through experience of poverty, Acute services operate a financial support service to ensure patients are supported.	No negative impact
(k)	(www.gov.scot) Other marginalised groups How have you considered the specific impact on other groups including homeless people, prisoners and ex- offenders, ex-service personnel, people with addictions, people involved in prostitution, asylum seekers & refugees and travellers?	New interventional procedures bring improvements in patient care meaning that all protected characteristic and other marginalised groups will benefit from enhanced diagnostic and treatment options. Where procedures are applied, delivery will meet the requirements of the Equality Act and Public Sector Equality	No negative impact

		Duty and person	
		centred care	
		methodology will ensure	
		that all patients receive	
_		bespoke support.	
8.	Does the service change or policy development include	Not relevant	
	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, harassmen <u>t and</u>		
	victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected		
	characteristics.		
	4) Not applicable		
		Service Evidence Provided	Possible negative impact and
			Additional Mitigating Action
			Required
L			

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 members of staff are required to undertake NHSGGC Statutory and Mandatory Equality and Human Rights Modules together with any relevant role-specific
		learning.

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.

Not applicable. The interventions governed by this policy will be subject to existing NHSGGC policies and wider legislation. It is anticipated that new interventions will support patients to live longer and healthier lives and reduce tie spent in health care settings.

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\*.

Not applicable. The policy follows national guidance which has been subject to appropriate levels of engagement and is also subject to robust governance frameworks.

- 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.

United Nations Convention on the Rights of the Child

The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024 came into force on the 16<sup>th</sup> July 2024. All public bodies may choose to evidence consideration of the possible impact of decisions on the rights of children (up to the age of 18). Evidence should be included below in relation to the General Principles of the Act. The full list of articles to be considered is available <u>here</u> for information.

No Discrimination: Where the decision may have an impact, explain how the EQIA has considered discrimination on the grounds of protected characteristics for children. You may have considered children in each of the EQIA sections and returned relevant evidence.

It is not anticipated that the policy will have any direct impact on the UNCRC Scotland Act. Local delivery of interventional procedures will be conducted in a way that meets the requirements of human rights legislation.

Best Interests of the child: Where the decision may have an impact, explain how the EQIA has evaluated possible negative, positive or neutral impacts on children. You may find that a options considered need to be reframed against the best possible outcome for children.

It is not anticipated that the policy will have any direct impact on the UNCRC Scotland Act. Local delivery of interventional procedures will be conducted in a way that meets the requirements of human rights legislation

Life, survival and development: Where the decision may have an impact, explain how the EQIA has considered a child's right to health and more holistic development opportunities.

It is not anticipated that the policy will have any direct impact on the UNCRC Scotland Act. Local delivery of interventional procedures will be conducted in a way that meets the requirements of human rights legislation.

Respect of children's views: Where the decision may have an impact, explain how the views of children have been sought and responded to. You need to consider what steps were taken in Q4 in relation to this.

It is not anticipated that the policy will have any direct impact on the UNCRC Scotland Act. Local delivery of interventional procedures will be conducted in a way that meets the requirements of human rights legislation.

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: Full mitigation of identified risk not made, decision to continue without objective justification (Lead Reviewer to provide explanatory note here):
- Option 5: 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)
No actions identified		

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

Lead Reviewer:	Name Kirsty Proctor
EQIA Sign Off:	Job Title Clinical Improvement Coordinator
-	Signature Kirsty Proctor
	Date 18/11/24

Quality Assurance Sign Off: (NHSGGC Assessments) Name Alastair Low Job Title Planning Manager Signature A Low Date 07/11/24

Where unmitigated risk has been identified in this assessment, responsibility for appropriate follow-up actions sits with the Lead Reviewer and the associated delivery partner.



## 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	leted
	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 Con	npleted by
	Date	Initials
Action:		
Reason:		
Action:		
Reason:		

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

		· · · · ·		To be completed	
				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>