

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 for further details or call 0141 2014560.

Name of	lame of Policy/Service Review/Service Development/Service Redesign/New Service:						
Patien	Patient/Informal Carer Administration of Subcutaneous Intermittent Medication in Adult Palliative Care Policy						
ls this a:	Current Service Service Development Service Redesign New Service New Policy Policy Review						
Descript	tion 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 NHSGGC Primary Care policy aims to support palliative or end of life care patients, and/or informal carers, to administer prescribed subcutaneous medication by intermittent injections.						
•	The medication will be given in order to facilitate effective and timely symptom control for Palliative and End of Life Care in people's own homes via a subcutaneous cannula which will be inserted by health care staff.						
•	This policy will enable patients who are unable to take oral medication or with poorly controlled symptoms to self-administer breakthrough medication when needed without waiting for a district nurse to visit to administer it.						
•	Patient and/or informal carers will only take part if they wish to do so. Those patients who are unable, or do not wish to participate, will continue to receive the service from District Nurses.						
•	Maintaining the safety of patients is a priority throughout this policy and specific eligibility and exclusion criteria are detailed in the policy to ensure this.						

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.)

• EQIA is a requirement for all NHSGGC policies where it is considered proportionate and relevant. Though this policy will apply to a very small cohort of patients and their named carer (estimated to be less than 10 per year) it will support palliative care patients to better manage symptoms, placing additional responsibilities on carers and considering aspects of capacity and competency associated with some protected characteristics.

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:
Patricia O'Gorman	06/09/2021 online via MS teams

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):

Shirley Byron	 •	<u> </u>
Patricia O'Gorman		
Claire O'Neill		
Jackie Wright		

		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.	It is expected that this Policy will be used infrequently. This has never been done in NHS Greater Glasgow and Clyde. Primary care team leads managing district nursing teams will collate information of patient/informal carers involved in administering intermittent subcutaneous medication in Palliative and end of life care. Data collecting all 9 protected characteristics will be available through nursing/medical documentation and community nursing information system (CNIS). In addition to the above, protected characteristic data (including SIMD data) will be collected via anonymised equality monitoring forms for all patients/carers administering medication using for the subcutaneous medication by patient/Informal Carer policy.	
	1) Remove discrimination, harassment and victimisation		pationismomal carer policy.	
	2) Promote equality of			
	opportunity			
	3) Foster good relations □ between protected characteristics.			
	4) Not applicable □			
		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.	A physical activity programme for people with long term conditions reviewed service user data and found very low	Though the patient/carer cohort supported by the policy will be small, data collected will be used to identify any possible patterning in uptake by protected characteristic group or SIMD status. Where there appears to be anomalies in terms of proportionate representation further work will be done to	

	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	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)	promote opportunities to under-represented groups.	
		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 young people.	Policies and guidance for patient and/or carer administration of subcutaneous medication in adult palliative care have been developed elsewhere within the United Kingdom ¹⁻⁵ . In Australia the benefits of this practice are reported as not only offering immediate symptom relief but carers also valued the role and felt that it gave them a sense of empowerment, pride and achievement as opposed to feelings of hopelessness ⁶ . Studies have shown that with appropriate education and support, carers can confidently administer subcutaneous medication to relieve breakthrough symptoms, including documenting appropriately, providing the right medication for the particular symptom and monitor effectiveness ⁷ . In a survey by Dying Matters, six out of ten people said that they would feel comfortable giving a pain relief injection to someone who was dying and wanted to stay at home.	

	opportunity 3) Foster good relations	(Due regard to removing discrimination, harassment	NHSGGC follows a number of other health boards who have been early adopters of this approach and will continue to	
	between protected characteristics	and victimisation and fostering good relations).	liaise with service leads as part of an ongoing learning and continuous improvement process.	
	4) Not applicable □		1. Twycross R, Wilcox A and Howard P. Procedures and safeguards for informal carers giving SC injections. Palliative Care Formulary 5th edition (2014). Palliativedrugs.com Ltd. Nottingham UK.	
			2. Patient/Carer Administration of Subcutaneous	
			Intermittent Medication in Adult Palliative Care Policy, NHS Lothian (April 2020)	
			3. NHS Grampian Policy and Staff Guidance On Patient and Informal Carer Administration Of Subcutaneous Medication By Intermittent Injection – Adult Palliative Care (2016)	
			4. The Lincolnshire Policy for Informal Carer's Administration of As Required Subcutaneous Injections in Community Palliative Care (2013)	
			5. South Tees Hospitals NHS Foundation Trust: Self Administration or Relative Administration of Subcutaneous Injections (2016)	
			6. Anderson BA, Kralik D. Palliative Care at Home: carers and medication management. Palliative Supportive Care Dec 2008;6(4):349-56	
			7. Healy S, Isreal F, Charles M and Reymond L. Lay carers can confidently prepare and administer subcutaneous injections for palliative care patients at home: A randomised controlled trial. Palliative Medicine May 2018. https://doi.org/10.1177/0269216318773878	
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
4.	Can you give details of how	A money advice service	A multi profession Short life working group was established	J J J J J J J J J J J J J J J J J J J
	you have engaged with	spoke to lone parents	to develop the policy. (Appendix 1).	
	equality groups with regard to the service review or	(predominantly women) to better understand	It is envisaged that this policy will be used rarely. Where	
	policy development? What	barriers to accessing the	appropriate, throughout the use of this policy ongoing patient	
	did this engagement tell you	service. Feedback	and carer experience will be gathered to achieve a better understanding of suitability and inclusion.	
	about user experience and	included concerns about	and notationing of buildbillity and molasion.	
	how was this information used?	waiting times at the drop in service, made more		
	usea?	in service, made more		

	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	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		
	4) Not applicable □	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?	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	This policy will be for patients with a palliative care diagnosis who are being cared for in their own home. There are no expected barriers to successful implementation, with patients having already received appropriate home assessments and adaptive resources where required.	
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).	request was placed to have the doors retained by magnets that could deactivate in the event of a fire.		
	1) Remove discrimination, harassment and victimisation	(Due regard to remove discrimination, harassment and victimisation).		

	2) Promote equality of opportunity 3) Foster good relations between protected characteristics.			
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
6.	How will the service change or policy development ensure it does not discriminate in the way it communicates with service users and staff? Your evidence should show	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	The policy sets out the expected provision for palliative and end of life care and this would include access to mainstream provision of any communication support required to ensure full involvement of related parties who do not have English as a first language or require other forms of support. Staff can access information via NHSGGC's Clear to All Policy which includes information on translated materials and interpreter support	
	which of the 3 parts of the General Duty have been considered (tick relevant boxes).	changes to Deaf service users.	interpreter support.	
	1) Remove discrimination, harassment and victimisation	Written materials were offered in other languages and formats.		
	2) Promote equality of opportunity	(Due regard to remove		
	3) Foster good relations between protected characteristics	discrimination, harassment and victimisation and		
	4) Not applicable The British Sign Language (Scotland) Act 2017 aims to raise awareness of British	promote equality of opportunity).		

	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 conterdisproportionate impact on people due to age? (Consider any age cut-offs that exist service design or policy content. You will objectively justify in the evidence section segregation on the grounds of age promotion policy or included in the service design).	differences in t in the need to any	This policy is intended for the care of Adults with a life limiting progressive illness/ or end of life care diagnosis. Named carers who wish to opt in to aligned training must be over 16 years or older. No upper age limit has been set.	For safety reasons, patients or carers considered for administration of subcutaneous medication would be required to understand and follow clear guidance. Fine motor skills would also be required. Some age-related impairments may exclude carers of patients from taking part in this programme. Where a patient or carer is
	Your evidence should show which of the General Duty have been considered (tick boxes).	•		unable to participate in the programme the District Nursing service would remain available to them.
	Remove discrimination, harassment ar victimisation	d ⊠		
	2) Promote equality of opportunity	\boxtimes		
	3) Foster good relations between protecte characteristics.	d □		
	4) Not applicable			
(b)	Disability Could the service design or policy conterdisproportionate impact on people due to characteristic of disability?	the protected	There is limited risk of the policy impacting on the protected characteristic of disability. All reasonable adjustments will be made to engage and involve related persons who have a disability that may otherwise experience barriers in using this policy. This would	Where a patient or carer has an impairment that prevents them from self-administering medication, their care needs would continue to be met by the appropriate peripatetic clinical support
	Your evidence should show which of the General Duty have been considered (tick		extend to provision of any communication support needs or	team.

	boxes).		aids.	
	 Remove discrimination, harassment and victimisation Promote equality of opportunity Foster good relations between protected characteristics. Not applicable 		It is expected that this service will be used infrequently and the numbers of individuals small. However it is imperative that patient safety is maintained when administering any medication using this policy. Any patient or informal carer must meet the eligibility and exclusion criteria of the policy to participate. If any criterion are not met the usual provision of care by nursing/medical staff will continue.	
	Protected Characteristic		Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(c)	Gender Identity Could the service change or policy have a disproportionate impact on people with the proportion of gender identity?	protected	There is no risk of the policy impacting on 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	\boxtimes		
	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
(d)	Marriage and Civil Partnership Could the service change or policy have a disproportionate impact on the people with t protected characteristics of Marriage and Civ Partnership?		The policy will have no impact on the protected characteristic of marriage and civil partnership. Staff will be aware of the need to avoid making assumptions about relationship status and ensure that all rights are afforded to next of kin in married or civil partnerships.	

	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 $\hfill\Box$ characteristics		
	4) Not applicable		
(e)	Pregnancy and Maternity	There is no anticipated impact on Pregnancy and Maternity	
	Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Pregnancy and Maternity?	from the implementation of the 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		
	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	Mainstream provision of communication support will ensure	
	Could the service change or policy have a disproportionate impact on people with the protected characteristics of Race?	that family members who do not have English as a first language are engaged with and included in any discussions relating to the policy.	
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant	For the safety of the patient it is vitally important that the individual administering medication using this policy is able to communicate with the nursing and medical staff effectively	

	boxes).	on a day to day basis which can be achieved through	
	1) Remove discrimination, harassment and victimisation	mainstream communication support and the use of translation services.	
	2) Promote equality of opportunity		
	3) Foster good relations between protected □ characteristics		
	4) Not applicable		
(g)	Religion and Belief	There is no anticipated impact on religion and belief through	
	Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Religion and Belief?	the application of the policy. Staff and families have access to NHSGGC's Faith and Belief Resource and peripatetic clinical teams are aware of the fundamental importance that religion will have with some families and be respectful and	
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).	inclusive at all times.	
	1) Remove discrimination, harassment and victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected $\hfill\Box$ characteristics.		
	4) Not applicable		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(h)	Sex	There is no clear risk of discrimination on the grounds of sex	The burden of care in society typically
	Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sex?	though data capture will show whether there is patterning in uptake by sex.	falls to women and though the opportunity to participate is voluntary there may be a sense of expectation that a female carer will be named. Staff will.
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).		to the best of their ability, ensure that there is no sense of obligation or coercion to participate and that any relevant supports for the carer are in

	1) Remove discrimination, harassment and			place.
	victimisation	\boxtimes		The district nurse will assess the patient
	2) Promote equality of opportunity			on a daily bases to ensure that
	3) Foster good relations between protected characteristics.			symptoms are well managed.
	4) Not applicable			
(i)	Sexual Orientation		The policy will not impact people with the protected characteristic of sexual orientation. Staff will adopt a personcentred care approach to the individuals involved using this Policy.	
	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	\boxtimes		
	2) Promote equality of opportunity	\boxtimes		
	3) Foster good relations between protected characteristics.			
	4) Not applicable			
	Protected Characteristic		Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(j)	Socio – Economic Status & Social Class		This policy will be implemented irrespective of an individual's socio-economic status or social class. Monitoring of SIMD data will identify any patterning that could indicate a skewed uptake by socio-economic status.	
	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?			
	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 th of socio-economic status.	e ground		
	1) Remove discrimination, harassment and victimisation	\boxtimes		
	2) Promote equality of opportunity			
	3) Foster good relations between protected characteristics.			
	4) Not applicable			
(k)	Other marginalised groups		There is limited risk of the policy impacting on other Marginalised Groups. This policy will not create additional barriers where the individuals meet the eligibility and exclusion criteria of the policy.	
	How have you considered the specific impact on other groups including homeless people, prisoners and exoffenders, ex-service personnel, people with addictions, people involved in prostitution, asylum seekers & refugees and travellers?			
	1) Remove discrimination, harassment and victimisation	\boxtimes		
	2) Promote equality of opportunity			
	3) Foster good relations between protected characteristics.			
	4) Not applicable			
8.	Does the service change or policy developme an element of cost savings? How have you me this in a way that will not disproportionately in protected characteristic groups?	nanaged	There will be no anticipated cost savings when implementing this the policy.	
	Your evidence should show which of the 3 pa General Duty have been considered (tick rele boxes).			
	1) Remove discrimination, harassment and victimisation			
	2) Promote equality of opportunity			

	3) Foster good relations between protected characteristics.			
	4) Not applicable	\boxtimes		
			Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
9.	What investment in learning has been made to discrimination, promote equality of opportunitions foster good relations between protected char groups? As a minimum include recorded contrates of statutory and mandatory learning professor (or local equivalent) covering equality, divers human rights.	ity and acteristic apletion ogrammes	All staff are required to complete a number of statutory and mandatory e-learning modules including the NHSGGC Equality, Diversity and Human Rights module.	

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.

No risks in relation to stated Human Rights Articles have been identified		

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*.

Though not directly informed by the PANEL principles, the rationale for the policy is to work alongside patients and carers in a way that meets those principles.

*

- 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.

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	ase use the box be	hat 'stands out' as an example of good practicelow to describe the activity and the benefits the number of the benefits the services.		
		quirements boxes completed above, please	Date for completion	Who is responsible?(initials)
summarise the actions this serv	ice will be taking f	forward.		
		nalysis to identify participating individuals by ke that requires additional investigation.		
Ongoing 6 Monthly Review ple	ease write your 6 r	monthly EQIA review date:		
Lead Reviewer:	Name	Claire O'Neill		
EQIA Sign Off:	Job Title	Palliative Care Lead Nurse and Clinical Serv	vices Manager	
	Signature	Claire Orbert		
	Date	10/11/2021		
Quality Assurance Sign Off:	Name	Alastair Low		
	Job Title Signature	Planning Manager		
	Date	23/11/2021		



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:

Cor	npleted
Date	Initials

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 or	riginal EQIA and reasons: To be completed by
	Date Initials
Action:	
Reason:	
Action:	
Reason:	
Please detail any discontinued actions that were originally plan	nned and reasons:
Action:	
Reason:	
Action:	

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					