

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

Tender for an ARBD citywide supported living service

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 proposal being equality Impact Assessed is the open tender process for the delivery a citywide ARBD supported living services in order to redress the imbalance of service availability and approaches across the city. During the tendering process, GCHSCP will ensure continuity of care for service users currently supported by ARBD supported Living services.

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 tendering of ARBD supported living services represents a significant investment in commissioned services and there is a requirement to ensure public funds are used in a way that upholds the responsibilities of the HSCP in relation to the Equality Act (2010) and associated Specific Duties (Scotland) Regulations 2012 in respect of the duty to consider award criteria in relation to public procurement. The proposal to tender is also in line with the Mental Welfare Commission for Scotland Good Practice Guide, Alcohol Related Brain Damage, and (ARBD).

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:
Teresa Martin (Senior Officer) Thomas Paterson, (Principal Officer)	25/10/19

--	--

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):

--

		<i>Example</i>	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
1.	<p>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.</p>	<p><i>A sexual health service collects service user data covering all 9 protected characteristics to enable them to monitor patterns of use.</i></p>	<p>Age-Yes Disability-Yes Gender reassignment-No Marriage and civil partnership status-No Pregnancy and maternity-No Race-No Religion and belief-Yes Sex-Yes Sexual Orientation-No</p> <p>The areas not captured above have not been included in core data capture within the ARBD recovery programme thus far, however in all aspects of service delivery any protected characteristics that have a bearing on treatment success will be sensitively included as part of person centred care commitments</p>	

	<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 between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>		<p>The majority of individuals consulted as part of the review process identified as White Scottish. At any one time, 60-70% of people accessing ARBD services are male.</p> <p>It is proposed that the new service model will collect the same user data as existing supported living services.</p> <p>The new service will be inclusive, culturally appropriate and accessible. Care should be anticipatory to meet the needs of those with protected characteristics (defined within the Equality Act 2010) rather than reactive. There will be clear processes outlining how the service will be delivered to service users with additional needs, such as, physical, sensory or learning disabilities and service users who do not speak or read English, including access to interpreting services when required. Activity and materials used to promote the service will be appropriate for those from protected characteristic groups and the provider will have the skills and knowledge to provide a service to marginalised communities.</p> <p>Specific needs due to protected characteristics will be identified by referrers and the new service will be flexible to make appropriate adjustments to the delivery of the service. The provider of the new service will develop strategies to attract and engage specific groups of service users, such as, women, pregnant women, individuals from black and minority ethnic communities, LGBTi communities, and individuals with disabilities. Monitoring of the uptake</p>	

			of specific groups of service users will be in line with the requirements of the Equality Act 2010	
		<i>Example</i>	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
3.	<p>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 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>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).</i></p>	<p>In 2005, an open tender process was carried out by Glasgow City Council. The 2005 tender made particular reference to “A Fuller Life – Report of the Expert Group on Alcohol related Brain Damage” (2004 Stirling university). This document raised concerns that the needs of people with ARBD were not being met by current service provision at the time and estimated that Greater Glasgow had 341 ARBD cases (population base 1999). A study in Argyle and Clyde reported a prevalence of 70/100,000. If a similar prevalence existed in Glasgow there would be in excess of 600 cases.</p> <p>Mental Health and Addictions commissioners carried out service reviews on ARBD supported living services and looked at outcomes across the system to make recommendations on future service delivery models. Commissioners consulted with service users, families, provider staff, operational colleagues and clinical leads over the course of the review. Review recommendations are in line with the feedback received.</p> <p>During the same timeframe, the GCHSCP carried out a review of the role and function of their directly provided multi-disciplinary ARBD team. The review processes were carried out alongside one another and recommendations link closely. The reviews presented an opportunity to develop stronger and more effective links between directly delivered and purchased ARBD service provision.</p>	

			In undertaking the consultations with users and families, learning from experience of protected characteristic groups has fed directly into the review process.	
		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>1) Remove discrimination, harassment and victimisation √</p> <p>2) Promote equality of opportunity √</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><i>(Due regard to promoting equality of opportunity)</i></p> <p><i>* The Child Poverty (Scotland) Act 2017 requires</i></p>	<p>As above – review of ARBD supported living services included direct engagement with service users and families in order to inform scope/model design. The vast majority of individuals consulted as part of the review process identified as White Scottish. At any one time, 60-70% of people accessing ARBD services are male. There were no notable differences in relation to patterns of responses across any protected group.</p>	

	<p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p><i>organisations to take actions to reduce poverty for children in households at risk of low incomes.</i></p>		
	<p>Example</p>	<p>Service Evidence Provided</p>	<p>Possible negative impact and Additional Mitigating Action Required</p>	
<p>5.</p>	<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>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</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. (Due regard to remove discrimination, harassment and victimisation).</i></p>	<p>Tendered service will continue to be fully accessible to service users and will be included as a core consideration within the tendering process.</p>	

	<p>protected Characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>			
		<i>Example</i>	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
6.	<p>How will the service change or policy development ensure it does not discriminate in the way it communicates with service users and staff?</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</p>		<p>The tendering process seeks to bring consistency and equity to service access across the city and so it is not anticipated that any detriment will be experienced through the resulting service delivery model. All partners will continue to use communication support pathways currently available via GCC and NHSGGC including the use of BSL interpreters and translation services.</p>	

	<p>characteristics ✓</p> <p>4) Not applicable</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>Age</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>There will be no change to age inclusion criteria through the open tendering process. Commissioned services will be minded to comply with the duties as set out in the Equality Act (2010) and associated Public Sector Equality Duty in relation to age discrimination and the promotion of an inclusive service.</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>		
(b)	<p>Disability</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 <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>There will be no change to disability inclusion criteria through the open tendering process. Commissioned services will be minded to comply with the duties as set out in the Equality Act (2010) and associated Public Sector Equality Duty in relation to disability discrimination. This will extend to ensuring all services are fully accessible (including provision of communication support) and that all reasonable adjustments are made to deliver fair and equitable services underpinned by a social model of disability and the promotion of an inclusive service.</p>	

	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(c)	<p>Gender Identity</p> <p>Could the service change or policy have a disproportionate impact on people with the protected characteristic of gender identity?</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>There will be no change to gender identity inclusion criteria through the open tendering process. Commissioned services will be minded to comply with the duties as set out in the Equality Act (2010) and associated Public Sector Equality Duty in relation to gender reassignment discrimination and the promotion of an inclusive service.</p>	
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(d)	<p>Marriage and Civil Partnership</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Marriage and Civil Partnership?</p> <p>Your evidence should show which of the 3</p>	<p>There will be no change to marriage and civil partnership inclusion criteria through the open tendering process. Commissioned services will be minded to comply with the duties as set out in the Equality Act (2010) and associated Public Sector Equality Duty in relation to marriage and civil partnership discrimination and the promotion of an inclusive service.</p>	

	<p>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>		
(e)	<p>Pregnancy and Maternity</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Pregnancy and Maternity?</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>There will be no change to pregnancy and maternity inclusion criteria through the open tendering process. Commissioned services will be minded to comply with the duties as set out in the Equality Act (2010) and associated Public Sector Equality Duty in relation to pregnancy and maternity and the promotion of an inclusive service.</p>	

	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(f)	<p>Race</p> <p>Could the service change or policy have a disproportionate impact on people with the protected characteristics of Race?</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>There will be no change to race inclusion criteria through the open tendering process. Commissioned services will be minded to comply with the duties as set out in the Equality Act (2010) and associated Public Sector Equality Duty in relation to race discrimination and the promotion of an inclusive service. Ongoing data capture and analysis will show any pattering of uptake of service by race. Provision of spoken language communication support (interpreting) and any translation of written materials would continue as per current arrangements.</p>	
(g)	<p>Religion and Belief</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Religion and Belief?</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>There will be no change to religion and belief inclusion criteria through the open tendering process. Commissioned services will be minded to comply with the duties as set out in the Equality Act (2010) and associated Public Sector Equality Duty in relation to religion and belief discrimination and the promotion of an inclusive service.</p>	

	3) Foster good relations between protected characteristics. <input type="checkbox"/> 4) Not applicable <input type="checkbox"/>		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(h)	Sex 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 and victimisation <input checked="" type="checkbox"/> 2) Promote equality of opportunity <input checked="" type="checkbox"/> 3) Foster good relations between protected characteristics. <input type="checkbox"/> 4) Not applicable <input type="checkbox"/>	There will be no change to sex inclusion criteria through the open tendering process. Commissioned services will be minded to comply with the duties as set out in the Equality Act (2010) and associated Public Sector Equality Duty in relation to sex discrimination and the promotion of inclusive and gender sensitive services.	
(i)	Sexual Orientation Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sexual Orientation? Your evidence should show which of the 3	There will be no change to sexual orientation inclusion criteria through the open tendering process. Commissioned services will be minded to comply with the duties as set out in the Equality Act (2010) and associated Public Sector Equality Duty in relation to sexual orientation discrimination and the promotion of inclusive and sensitive services.	

	<p>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>Protected Characteristic</p>	<p>Service Evidence Provided</p>	<p>Possible negative impact and Additional Mitigating Action Required</p>
(j)	<p>Socio – Economic Status & Social Class</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>	<p>The experience of poverty will not be exacerbated by the open tendering process and the resulting service models will be underpinned by an understanding of socio economic status and links to ARBD.</p>	
(k)	<p>Other marginalised groups</p> <p>How have you considered the specific impact on other groups including homeless people, prisoners and ex-offenders, ex-service</p>	<p>The experience of discrimination experienced by other marginalised groups will not be exacerbated by the open tendering process and the resulting service models will be fully inclusive of the needs of other marginalised groups.</p>	

	<p>personnel, people with addictions, people involved in prostitution, asylum seekers & refugees and travellers?</p>		
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 type="checkbox"/></p>	<p>No – there is an expectation that the open tendering process will achieve improved equity of access within the existing financial package.</p>	
		Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
9.	<p>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.</p>	<p>The open tendering process will ask commissioned services to demonstrate the skill of staff responsible for delivering any contracted services and this will extend to competence in learning related to equality and diversity.</p>	

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 open tendering process will require commissioned services to demonstrate compliance with existing human rights legislation.

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

The open tendering process has been informed by engagement with service users and their families.

***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)
No actions to take forward		

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

**Lead Reviewer:
EQIA Sign Off:**

**Name
Job Title
Signature
Date**

Quality Assurance Sign Off:

**Name Alastair Low
Job Title Planning Manager
Signature
Date 5th November**

**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:

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

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

Action:	
Reason:	
Action:	
Reason:	

Please write your next 6-month review date

--

Name of completing officer:

Date submitted:

Please ensure a copy of your completed EQIA is published for viewing externally.