



NHS Greater Glasgow & 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 ggc.equality.team@nhs.scot for further details or call 0141 201 4874.

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

Deregistration of two care homes for homeless adults provided by the Talbot Association - Buchanan Lodge and Riverside.

Please tick the relevant box:-

- Current Service ☒
- Service Development ☐
- Service Redesign ☐
- New Service ☐
- New Policy ☐
- Policy Review ☐

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Description of the service & rationale for selection for EQIA. (Please state if this is part of a service-wide consideration 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.

Both services have evidenced of a lack of demand in recent years.

Although Glasgow is currently experiencing a housing emergency, declared November 2023, both services have regularly sat with no pending admissions, and in particular, Buchanan Lodge has often sat with several vacancies – in summer 2025 the service sat with 5 of their 40 placements vacant.

However, Riverside's low level of referrals could also be in part attributable by the service having a highly static population. As vacancies rarely arise, referral activity is consequently limited.

Anecdotal evidence suggests the care home registration is a barrier to people accepting a placement as there is considerable financial cost to them. An individual must surrender their entire income (barring the mobility component of Personal Independence Payment (PIP) if eligible) to cover the cost of a placement, in exchange for a weekly allowance of £35.90 (2025/26). Three meals, plus supper are provided each day, as is full laundry assistance.

Again, anecdotally, the service models do not feel considerably different from the other non-care home registered homeless accommodation services, therefore the increased financial cost is perceived as arbitrary. Although the care home registration enables the services to support individuals fully with medication and intimate personal care, this level of care is often not required, and the other existing services are able to provide a similar level of care under different registrations.

The care homes do not operate like mainstream residential care home models, as individuals must be orientated to time, place and person, and be able to self-transfer. Furthermore, as both services sit within Glasgow's homelessness accommodation provision, potential referrals are for adults with capacity, and a care home placement is not an attractive option, even for a temporary period whilst settled accommodation is sought.

Feedback was sought from service users in 2025 as part of the All in for Glasgow (AIFG) (phase 2) accommodation-based service redesign program. Although this feedback was from service users from across homelessness accommodation services, there was feedback noted from current Buchanan Lodge residents.

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Feedback highlighted the both positive and negatives for the care home service model – positives related to the wrap-around support offered, whilst negatives related to the restricted weekly income. One resident was noted as saying: 'This is my permanent home, and I want to stay here'.

Buchanan Lodge

Buchanan Lodge was established in 2000 and was conceived as a replacement service for Calderbank House (Talbot Association) which had accommodated elderly homeless men since 1982. Buchanan Lodge is originally a 1960's, purpose-built unit, previously owned by GCC, and transferred to Cassiltoun Housing Association in 2000. The building was extensively remodelled, completing in 2012, and provides a residential care service for older men experiencing homelessness. The service offers 40 placements for men.

The service was designed to meet the needs of homeless men, who resided in hostels, and whose increasing care and support needs meant they required a care home setting. The service was designed to offer long term accommodation to this cohort of individuals, and this remains the case in 2025. It was envisaged that most referrals would be for men over the age of 60yrs, but that some service users who were over 45yrs would also be appropriate.

The service now considers referrals for males aged 45+ and offers both long term placements and resettlement placements (where support is provided to develop the skills necessary to maintain their own independent tenancies).

Riverside

Riverside was established in 1993 and is based in purpose-built accommodation in Govan. The service offers 12 placements and was designed to meet the needs of homeless people, aged 18 years and who have severe and enduring, but stable, mental health problems in addition to poly-drug use, comorbidities, and associated challenging behaviours.

The service is defined as a resettlement service, and placements should be focused on supporting people to develop the skills necessary to maintain their own independent tenancies and moving people on from homelessness. The reality, however, is 11 of the 12 placements have been in the service over 2 years, with the average length of stay 15 years (5458.1 days, range 215-8829 days).

Next Steps

It is proposed both services revert to a dual housing support with care at home registration. This will enable a similar level of support to be provided. The same meals and laundry support will be available.

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This registration will enable the provider to request Housing Benefit to support the cost of each placement. For individuals, placed in either service, this means a weekly service charge will payable (likely around £50) to cover the costs of meals, laundry and utilities. Individuals will be able to apply for Housing Benefit to cover the remainder of their placement costs.

Following deregistration, the Riverside service would revert to emergency accommodation provision and Buchanan Lodge would remain as both a long-term accommodation option for older males, and where required, a resettlement service. Alternative homeless accommodation is available for men under 45 across Glasgow, so younger men with care and support needs are not excluded from provision following the deregistration of these services.

The existing residents of Riverside have recently undergone review by the Care Home Quality Assurance Team (CHQAT) and individual move on plans for each person have been developed. The change of registration alongside the move-on of the existing cohort of placements should support the change of service model.

The All in for Glasgow (AIFG) (phase 2) service redesign program was launched in November 2025. This program will lead of the redesign of all supported accommodation services currently delivered under addictions, homelessness, justice and mental health services. It is recognised these services have traditionally been designed and operated within specific care-group 'silos' and it is hoped the new service models will embody a collective and collaborative approach to the provision of supported accommodation.

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.

This service was selected for EQIA because of the proposed change of registration status for both Buchanan Lodge and Riverside, which links directly to the objectives of the All in for Glasgow (AIFG) (phase 2) service redesign programme and the wider commissioning priority of moving away from care-group silos towards a collective, collaborative model of supported accommodation.

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)

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Name: Pete Dumayne

Date of Lead Reviewer Training: 13/02/2025

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)

Pete Dumayne, Senior Officer, GCHSCP Homelessness Commissioning

Fran Calder, Senior Officer, GCHSCP Commissioning

David Fernie, Principal Officer, GCHSCP Commissioning

Kirstin Abercrombie, Senior Officer, GCHSCP Commissioning

Angela Dowdalls, Principal Officer, GCHSCP Commissioning

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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 below any barriers to collecting this data in your submitted evidence and an explanation for any protected characteristic data omitted.

Example: A sexual health service collects service user data covering all 9 protected characteristics to enable them to monitor patterns of use.

Service Evidence Provided:

The following evidence was consulted:

[Homelessness in Scotland 2024-25](#)

- 69% of homelessness households are single person households – men account for 48%, and women 21%.
- 72% of people previously assessed as homeless in last year are men
- Men are more likely to become homeless from prison and PRS (Private Rented Sector) shared properties.
- 30% of applications attributed MH as a presenting circumstance compared to 12% in 2007-08

[Homelessness Monitor 2024](#)

- single males have continued to account for almost half of all applicants (46% in 2022/23)
- single females (21% in 2022/23)

Hard Edges research details the extent and nature of severe and multiple disadvantage people in Scotland can face.

[Hard Edges Scotland 2019](#)

- 5 disadvantages – Domestic Violence & Abuse, Homelessness, Mental Health, Substance Dependency, Offending
- ‘... the highest risks are associated with being younger (under 40), single, white, and male.’

Commissioning Equalities Data

- PSR (Provider Service Return) issued six monthly with standard equalities questions to ensure contract compliance

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- Commissioning annual equalities return – detailed service specific equalities information. Most recently submitted 09/2025.

Buchanan Lodge Annual Equality Return 2025:

- 36 males
- Age range: 25-49 – 1; 50-64 – 20; 65+ - 15.
- Transgender: 0
- Disability/long term health concerns: 36
- Ethnicity: African, Scottish African or British African - 1; Scottish - 34; Other British – 1
- Religion and Belief: Church of Scotland - 15; None – 11; Other Christian – 1; Roman Catholic – 9
- Sexual Orientation: Gay or Lesbian – 1; Straight/Heterosexual – 34; Prefer not to say – 1

Riverside Annual Equality Return 2025:

- 12 males, 0 females
- Age range: 25-49 – 2; 50-64 – 5; 65+ - 5.
- Transgender: 0
- Disability/long term health concerns: 12 (mental health 12)
- Ethnicity: Scottish - 11; Other British – 1
- Religion and Belief: Prefer not to say - 12
- Sexual Orientation: Prefer not to say – 12

Possible negative impact and additional mitigating action required:

No work in relation to the deregistration of services will negatively impact equality data collection as equalities will reporting will continue.

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2. Please provide details of how data captured has been/will be used to inform policy content or service design.

Your evidence should show which of the 3 parts of the General Duty have been considered. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics. ☐
- 4) Not applicable ☐

Example

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)

Service Evidence Provided:

Both services were reviewed in 2025 in preparation for the upcoming AIFG (phase 2) service redesign programme.

Review's recommended both services would be included within AIFG programme but also made interim recommendations, which are to be progressed whilst AIFG gets underway.

These interim recommendations were made to make best use of existing services.

Reviews evidenced low demand for care home services, largely due to financial impact on people accessing the services. It was also recognised similar service models could be provided under different registrations (as noted above).

General duty 1 and 2 have been considered.
Data was utilised in the service review to inform the findings and recommendations.

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Buchanan Lodge service model will remain unchanged, and, whereas Riverside service will change to emergency accommodation, existing residents have already been reviewed by CHQAT and move on plans formulated.

Possible negative impact and additional mitigating action required:

Disability

Riverside is a mixed sex MH focused service. Reverting Riverside to emergency accommodation will reduce the number of MH homelessness beds available in the city by 12.

Currently there are 20 mixed sex MH HL beds available in the city. The reduction of 12 beds is a 66.67% reduction in HL MH placements.

The service has had a very static population with average length of stay in the service 5098 days (R = 213-8913 days).

The expected length of stay in the service is 6 months therefore, for each calendar year, ideally the service should provide 24 placements. Data shows, due to the static population of the service, only 2 placements have become available within the last 3 years. Therefore, it can be concluded that Riverside has not been operating at maximum capacity for several years, and the change of service delivery will have a minimal impact on the actual number of MH HL beds available in the city.

Outwith homelessness service provision there are 18 MH supported accommodation services delivering 154 placements. Should an individual require long term MH supported accommodation this would be the next step for them, and the proposed changes will have no impact on the access to these services. Although, the MH supported services do not typically offer long term placements, and are classed as move on, recovery focused services.

However, Riverside's service model of supporting people with MH support needs together with ongoing addiction issues is not replicated in the MH accommodation services in the community. Of the existing 12 people in the service, several do still have ongoing addiction support needs.

For people with comorbid addiction and mental health support needs, the existing network of 18 MH supported accommodation services (154 placements) remains available, and individual move-on planning, led by CHQAT and Social Work, ensures comorbid needs are reflected in each person's future placement.

Sex

Buchanan Lodge is a male only service however proposed deregistration will have no impact on availability of male placements as service is to remain male only with same access criteria.

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Although Riverside is classed as a mixed service, there have been no female service users for several years. The last placement did not work out as the placed female felt uncomfortable being the only female service user in the service. The static nature of the population has made it difficult introducing female placements.

There would be no restrictions placing the men currently placed in Riverside in mixed accommodation.

AIFG (phase 2) will consider the need of homeless individuals who require a MH specific resource and work collaboratively to ensure that there is no adverse impact.

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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. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics ☐
- 4) Not applicable ☐

Example

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).

Service Evidence Provided:

Hard Edges research details the extent and nature of severe and multiple disadvantage people in Scotland can face.

[Hard Edges Scotland 2019](#)

- 5 disadvantages – Domestic Violence & Abuse, Homelessness, Mental Health, Substance Dependency, Offending
- ‘... the highest risks are associated with being younger (under 40), single, white, and male.’

[The Supported Accommodation Task and Finish report](#)

- Suggests self-contained accommodation is preferable to shared accommodation and both Buchanan Lodge and Riverside offer shared accommodation.

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General duty 1 and 2 have been considered.

Research shows homelessness is a multidimensional experience and is not simply just a lack of housing. Rather, homelessness, is an intersection of multiple issues, and homeless services need to recognise this, and be able to provide support holistically.

Furthermore, anecdotal evidence suggests the care home registration is a barrier to people accepting a placement as there is considerable financial cost to them. An individual must surrender their entire income (barring the mobility component of Personal Independence Payment (PIP) if eligible) to cover the cost of a placement, in exchange for a weekly allowance of £35.90 (2025/26). Three meals, plus supper are provided each day, as is full laundry assistance.

Again, anecdotally, the service models do not feel considerably different from the other non-care home registered homeless accommodation services, therefore the increased financial cost is perceived as arbitrary. Although the care home registration enables the services to support individuals fully with medication and intimate personal care, this level of care is often not required, and the other existing services are able to provide a similar level of care under different registrations. Consultation with service users has taken place. The Care Home Quality Assurance Team (CHQAT) completed statutory reviews with current Riverside residents in 2025, gathering direct feedback on their experience of the service, including anecdotal evidence of residents declining to move on from placements due to institutionalisation and reduced confidence. This feedback has directly informed the transition and move-on planning approach.

The care homes do not operate like mainstream residential care home models, as individuals must be orientated to time, place and person, and be able to self-transfer. Furthermore, as both services sit within Glasgow's homelessness accommodation provision, potential referrals are for adults with capacity, and a care home placement is not an attractive option, even for a temporary period whilst settled accommodation is sought.

AIFG (phase 2) will recognise this and lead of the redesign of all supported accommodation services for complex adults.

The All in for Glasgow (AIFG) (phase 2) service redesign program was launched in November 2025. This program will lead of the redesign of all supported accommodation services currently delivered under addictions, homelessness, justice and mental health services. It is recognised these services have traditionally been designed and operated within specific care-group 'silos' and it is hoped the new service models will embody a collective and collaborative approach to the provision of supported accommodation.

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Possible negative impact and additional mitigating action required:

Disability

Riverside is a mixed sex MH focused service. Reverting Riverside to emergency accommodation will reduce the number of MH homelessness beds available in the city by 12.

Reclassifying Riverside as emergency accommodation will also increase the number of DDA-compliant emergency accommodation placements available in the city by 12, as these beds move from MH-specific supported accommodation into general emergency accommodation provision.

Currently there are 20 mixed sex MH HL beds available in the city. The reduction of 12 beds is a 66.67% reduction in HL MH placements.

The service has had a very static population with average length of stay in the service 5098 days (R = 213-8913 days).

The expected length of stay in the service is 6 months therefore, for each calendar year, ideally the service should provide 24 placements. Data shows, due to the static population of the service, only 2 placements have become available within the last 3 years. Therefore, it can be concluded that Riverside has not been operating at maximum capacity for several years, and the change of service delivery will have a minimal impact on the actual number of MH HL beds available in the city.

Outwith homelessness service provision there are 18 MH supported accommodation services delivering 154 placements. Should an individual require long term MH supported accommodation this would be the next step for them, and the proposed changes will have no impact on the access to these services.

Sex

Buchanan Lodge is a male only service however proposed deregistration will have no impact on availability of male placements as service is to remain male only with same access criteria.

AIFG (phase 2) will consider the need of homeless individuals who require a MH specific resource and work collaboratively to ensure that there is no adverse impact.

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. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics ☐
- 4) Not applicable ☐

Example

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.

Service Evidence Provided:

GHIFT (Glasgow Homelessness Involvement & Feedback Team) carried out service user interviews across all homelessness services reviewed, including Buchanan Lodge, and provided feedback as well as recommendations based on the views of those living in services.

Their findings included feedback relating to service charges applicable to those staying in supported accommodation, with 50% of respondents stating they felt a service charge was unfair.

Whilst the deregistration will not remove the requirement for a service charge for both Buchanan Lodge and Riverside, it will substantially reduce the financial burden for

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people accessing these services. Currently an individual must surrender their entire income (excluding the mobility component of Personal Independent Payment (PIP) if in receipt) in exchange for a weekly personal expenses allowance (£35.90). Whereas the new services will charge £30 service charge (for meals and utilities) per week.

General duty 1 and 2 have been considered.

Possible negative impact and Additional Mitigating Action Required:

Several of the individuals currently resident in Buchanan Lodge and Riverside have been in these services for several years and therefore are not used to managing their finances (beyond their personal expenses allowance). Concerns have been raised that for some individuals having access to substantially increased finances therefore may have a negative impact on their current drug and alcohol consumption.

Operational teams, alongside the service provider, are intending to review all existing service users to ensure appropriate mitigations are considered and included in each individual's care and support plan. It is anticipated these reviews will commence in Summer 2026 and be completed by end of December 2026.

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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. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics ☐
- 4) Not applicable ☐

Example

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).

Service Evidence Provided:

Both services have DDA compliant accessible accommodation, and this will not be impacted by the deregistration of the services.

Reclassifying Riverside as emergency accommodation will reduce the number of MH specific homelessness supported accommodation beds that are available in the city but will increase the number of DDA available accommodation for emergency placements in the city.

Possible negative impact and additional mitigating action required:

There will be one fewer DDA compliant MH HL placement available in the city.

Outwith homelessness service provision there are 18 MH supported accommodation services delivering 154 placements. Should an individual require long term MH

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supported accommodation this would be the next step for them, and the proposed changes will have no impact on the access to these services.

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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 which of the 3 parts of the General Duty have been considered. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected 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.

Example

Following a service review, an information video to explain new procedures was hosted on the organisation's YouTube site. This was accompanied by a BSL signer to explain service changes to deaf service users.

Written materials were offered in other languages and formats. (Due regard to remove discrimination, harassment and victimisation and promote equality of opportunity).

Service Evidence Provided:

The deregistration process will take at least 1 year. A project plan has been created with key communication milestones included.

Initially the provider will inform all current residents of the planned changes and how this will personally affect each person. This will be completed in person, via the usual care and support planning process.

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Thereafter, operational teams will review each person's placement to ensure the placement remains appropriate and the person is aware of the changes and how they will impact them. This will be completed in person.

Each person will be fully involved in reviewing and updating their care plan throughout the process, in line with other Support Needs Assessments (SNAs), including opportunities to ask questions and share their views as part of individual support planning.

For those in Riverside, with the reclassification as an emergency service, those currently accommodated in the service will be moved on from the service. The process of move on planning has already begun and operational colleagues are leading on this. Each person has received a support needs assessment and several face-to-face meetings with social work staff.

For all people currently accommodated in the two services, their first language is English, and none require the support of an interpreter (including deaf interpreters). However, 2 individuals in Riverside and 12 individuals in Buchanan Lodge are cognitively impaired, likely due to dementia, and will therefore require bespoke communication methods. These will need to be considered in partnership with care management and those with proxy powers.

General duty 1 and 2 have been considered.

Possible negative impact and additional mitigating action required :

The 14 individuals identified with some form of cognitive impairment will require bespoke and considered communication approaches. A possible negative impact is that these changes are not communicated in an effective manner.

Furthermore, some individuals may have been deemed to lack capacity and there may not be proxy powers in place. For these individuals any changes to financial arrangements may not be able to be made. Operational teams will review all existing residents to highlight these individuals and liaise with care management.

Individuals identified as lacking capacity, or where proxy powers are not in place, will be supported through involvement of care managers, welfare guardians, advocates or appropriate adults, with early legal advice sought on guardianship or intervention orders where required.

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7. Protected Characteristic

(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 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. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics. ☐
- 4) Not applicable ☐

Service Evidence Provided:

The average age for each service is:

- Buchanan Lodge 65 (range 46-86)
- Riverside 62 (range 41-81)

Although the deregistration of Buchanan Lodge should have little impact on service delivery, the deregistration and reclassification of the Riverside service will have an impact on the current population of the service who are older as the service model will be changed from resettlement to emergency accommodation. Therefore existing residents will need to be moved on from the service.

It should be noted Riverside was never designed as a long-term placement. A parallel review process is underway, led by CHQAT and Social Work, to match each existing

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resident with an appropriate alternative placement as part of individual move-on planning.

Younger men with care needs who would previously have been referred to Riverside will continue to have access to alternative homeless accommodation elsewhere in Glasgow, so no one is excluded from provision as a result of this change.

It should be noted however, that Riverside was never designed as an older person homelessness service.

General duty 1 and 2 have been considered.

Possible negative impact and additional mitigating action required:

Although Riverside's reclassification will remove 12 beds which are currently occupied by older men, there are still several HL accommodation services, including Buchanan Lodge, that are suitable for older men.

Furthermore, should an older person be assessed as requiring a care home service, there are numerous older person residential and nursing care homes available within the city that would be more appropriate than a homelessness accommodation service.

It is also noted Buchanan Lodge has often operated under-occupied, for example sitting with 5 of 40 placements vacant in summer 2025, further supporting its capacity to accommodate any additional referrals arising from Riverside's reclassification.

In summary, the following mitigations apply: Buchanan Lodge will continue to operate unchanged and has capacity to accommodate additional referrals. Existing residents will have access to Housing Benefit and financial support through the transition, with individual benefits checks and welfare rights input provided for anyone affected by the change to service charges. For Riverside, a parallel review process led by CHQAT and Social Work is underway, with individual move-on plans developed for each resident. While the reclassification will reduce the number of MH-specific homelessness beds in the city by 12, it will correspondingly increase the number of general emergency accommodation beds available by the same number.

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(b) Disability

Could the service design or policy content have a disproportionate impact on people due to the protected characteristic of disability?

Your evidence should show which of the 3 parts of the General Duty have been considered. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics. ☐
- 4) Not applicable ☐

Service Evidence Provided:

Riverside is a MH focused service. Reverting Riverside to emergency accommodation will reduce the number of MH homelessness beds available in the city by 12.

General duty 1 and 2 have been considered.

It is recognised that, given the nature of the service, many residents have care needs which would be covered under the protected characteristic of disability, including Dementia and Mental Health conditions. Support for these needs will continue through the involvement of Social Work, Occupational Therapy and care management throughout the transition, and individual support plans will be reviewed to ensure needs continue to be met.

Possible negative impact and additional mitigating action required:

Currently there are 20 MH HL beds available in the city. The reduction of 12 beds is a 66.67% reduction in HL MH placements.

The service has had a very static population with average length of stay in the service 5098 days (R = 213-8913 days).

The expected length of stay in the service is 6 months therefore, for each calendar year, ideally the service should provide 24 placements. Data shows, due to the static population of the service, only 2 placements have become available within the last 3

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years. Therefore, it can be concluded that Riverside has not been operating at maximum capacity for several years, and the change of service delivery will have a minimal impact on the actual number of MH HL beds available in the city.

Outwith homelessness service provision there are 18 MH supported accommodation services delivering 154 placements. Should an individual require long term MH supported accommodation this would be the next step for them, and the proposed changes will have no impact on the access to these services. Although, the MH supported services do not typically offer long term placements, and are classed as move on, recovery focused services.

However, Riverside's service model of supporting people with MH support needs together with ongoing addiction issues is not replicated in the MH accommodation services in the community. Of the existing 12 people in the service, several do still have ongoing addiction support needs.

Support needs will continue to be met through individual assessment and move-on planning. As noted above, the wider network of MH supported accommodation services in the city provides an alternative for anyone requiring ongoing mental health and addiction support beyond Riverside.

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(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. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics ☐
- 4) Not applicable ☐

Service Evidence Provided:

Riverside is a mixed gender service and Buchanan Lodge is a male only service. This will remain the case following deregistration of both services and following Riverside's change to emergency accommodation.

Transgender people can access both services currently and this will continue to be the case. Equality and Human Rights Commission guidance will be followed. Buchanan Lodge's male-only status is justified as it supports older homeless men (45+) with increasing care and support needs, reflecting its established client group; this will remain unchanged following deregistration. Riverside is a mixed-sex service by registration and design, and continues to be so; its current all-male occupancy reflects a low rate of referrals for women rather than a restriction on access. Both services provide single rooms, supporting privacy and dignity regardless of the sex mix of residents.

Possible negative impact and additional mitigating action required:

No change to service delivery. Transgender people will still be able to access services.

(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. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics ☐
- 4) Not applicable ☐

Service Evidence Provided:

Marriage and Civil Partnership status is not a factor in the decisions being taken. Noted that the service only supports to individuals and cannot accommodate couples/family groups.

Possible negative impact and additional mitigating action required:

Riverside and Buchanan Lodge can only accept single person households. There are three other HL supported accommodations that offer couple supported accommodation.

(e) Pregnancy and Maternity

Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Pregnancy and Maternity?

Your evidence should show which of the 3 parts of the General Duty have been considered. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics ☐
- 4) Not applicable ☐

Service Evidence Provided:

Riverside can support pregnant people however the service only offers support to single person households.

Buchanan Lodge is a male only service.

Possible negative impact and additional mitigating action required:

The proposed changes will have no impact of service access requirements. Riverside will still be able to accept pregnant people if this is felt to be the most suitable resource.

There is other supported accommodation service, including several women only services, that can offer accommodation to pregnant people.

There are no 'mother and child' supported HL accommodations available in Glasgow. The only option would be a Temporary Furnished Flat.

(f) Race

Could the service change or policy have a disproportionate impact on people with the protected characteristics of Race?

Your evidence should show which of the 3 parts of the General Duty have been considered. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☐
- 2) Promote equality of opportunity ☐
- 3) Foster good relations between protected characteristics ☐
- 4) Not applicable ☐

Service Evidence Provided:

Buchanan Lodge Annual Equality Return 2025:

- Ethnicity: African, Scottish African or British African - 1; Scottish - 34; Other British – 1

Riverside Annual Equality Return 2025:

- Ethnicity: Scottish - 11; Other British – 1

Race is not a factor in the decisions being taken.

Ethnicity data is collected twice yearly via PSR, as referenced above. No interpreting or translation support is currently required by service users, but this will continue to be made available to any future service user who requires it.

Possible negative impact and additional mitigating action required:

An individual's race is not a consideration of the service or any homelessness service.

Any individual who requires additional support associated with their ethnicity would receive this via mainstream provision like interpreting support.

(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. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics. ☐
- 4) Not applicable ☐

Service Evidence Provided:

Religion and Belief are not a factor in the decisions being taken.

Provision for dietary requirements and prayer space will continue to be made available to any individual who requires it.

Buchanan Lodge Annual Equality Return 2025 recorded: Church of Scotland - 15; None – 11; Other Christian – 1; Roman Catholic – 9. Riverside Annual Equality Return 2025 recorded: Prefer not to say – 12.

Possible negative impact and additional mitigating action required:

An individual's religion is not a consideration of the service or any homelessness service.

(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. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics ☐
- 4) Not applicable ☐

Service Evidence Provided:

Buchanan Lodge is a male only service and will remain so after the deregistration. Riverside will remain a mixed service.

Statistics evidence that men account for more than double the number of homeless applications that women do.

Buchanan Lodge Annual Equality Return 2025 recorded 36 male service users. Riverside Annual Equality Return 2025 recorded 12 males and 0 females, reflecting the service's current registration and referral pattern.

Possible negative impact and additional mitigating action required:

There are no changes planned relating to gender/sex admission criteria for either service.

Riverside's current male only status may require a transition period to ensure future female placements are managed appropriately.

Within homelessness accommodation services there are several other male only and female only services as well as four additional mixed 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 parts of the General Duty have been considered. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics. ☐
- 4) Not applicable ☐

Service Evidence Provided:

An individual's sexual orientation is not a factor in the decisions being taken.

Buchanan Lodge Annual Equality Return 2025 recorded: Gay or Lesbian – 1; Straight/Heterosexual – 34; Prefer not to say – 1. Riverside Annual Equality Return 2025 recorded: Prefer not to say – 12.

Possible negative impact and additional mitigating action required:

An individual's sexual orientation is not a consideration of the service or any homelessness service.

(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 below 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 strategic decisions and complete a separate assessment. Additional information available from the [Fairer Scotland Duty: guidance for public bodies - gov.scot](https://www.gov.scot/publications/fairer-scotland-duty/guidance-for-public-bodies/pages/11.aspx)

Service Evidence Provided:

Research shows that poverty is a main driver of homelessness.

The deregistration of both services will make them more affordable for people to access.

Evidence shows Buchanan Lodge and Riverside receive far fewer referrals compared with similar services that are not registered as a care home.

Anecdotal evidence suggests the main detractor for both Buchanan Lodge and Riverside is the current requirement for a person to surrender their entire income in exchange for a weekly personal expenses allowance.

Whilst the deregistration will not remove the requirement for a service charge for both Buchanan Lodge and Riverside, it will substantially reduce the financial burden for people accessing these services. Currently an individual must surrender their entire income (excluding the mobility component of Personal Independent Payment (PIP) if in receipt) in exchange for a weekly personal expenses allowance (£35.90). Whereas the new services will charge £30 service charge (for meals and utilities) per week.

Possible negative impact and additional mitigating action required:

Several of the individuals currently resident in Buchanan Lodge and Riverside have been in these services for several years and therefore are not used to managing their

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finances (beyond their personal expenses allowance). Concerns have been raised that for some individuals having access to substantially increased finances therefore may have a negative impact on their current drug and alcohol consumption.

Operational teams, alongside the service provider, are intending to review all existing service users to ensure appropriate mitigations are considered and included in each individual's care and support plan.

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(k) 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?

Service Evidence Provided:

Homeless people are some of the most marginalised people in society. The deregistration of both services will make them more affordable for people to access.

The reclassification of Riverside will support people to move on from homelessness more quickly and improve outcomes for people using the service.

Possible negative impact and additional mitigating action required:

Buchanan Lodge is seen by many of the longer-term residents as a home for life. This is reflected in recent feedback received from people staying in the service.

Whereas the deregistration will not change the service model, there will likely be an increase in referrals into the service. The removal of the care home registration may have a perceived effect on who can access this service, i.e. current perceptions are the service is for older men with higher care needs.

Equally, the longer-term residents may perceive the change as a change to their right to remain in Buchanan Lodge.

The provider will ensure residents are regularly informed as the deregistration process continues. HSCP operational colleagues will also be meeting with existing residents.

Riverside's repurposing as emergency accommodation, following deregistration, will reduce the number of HL MH supported beds in the city by 12.

Currently there are 20 MH HL beds available in the city. The reduction of 12 beds is a 66.67% reduction in HL MH placements.

The service has had a very static population with average length of stay in the service 5098 days (R = 213-8913 days). For Riverside to be repurposed as emergency

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accommodation all existing residents will need to move on. Many of the existing residents may perceive Riverside as their 'home for life'.

Riverside's residents have all been reviewed by the Care Home Quality Assurance Team and move on planning has commenced. Residents will not be moved on without full planning and their full engagement and agreement. This will be overseen by HSCP operational colleagues.

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8. 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?

Your evidence should show which of the 3 parts of the General Duty have been considered. Please tick the relevant box:-

- 1) Remove discrimination, harassment and victimisation ☒
- 2) Promote equality of opportunity ☒
- 3) Foster good relations between protected characteristics ☐
- 4) Not applicable ☐

Service Evidence Provided:

Although cost savings were not a consideration of the service changes there will be a cost saving to the HSCP. Whereas services are currently fully funded by the HSCP, following deregistration, partial service costs will be eligible for Housing Benefit.

Possible negative impact and additional mitigating action required:

9. What investment in learning has been made to prevent discrimination, promote equality of opportunity and foster good relations between protected characteristic groups?

As a minimum include below recorded completion rates of statutory and mandatory learning programmes (or local equivalent) covering equality, diversity and human rights.

Service Evidence Provided:

The Talbot Association adheres to the training requirements as outlined by the Contract Management Framework (CMF).

Possible negative impact and additional mitigating action required:

This is monitored biannually via the Provider Service Return and via the Contract Management Framework.

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 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 specific risks in relation to Human Rights are identified in relation to the deregistration of the two services and the reclassification of Riverside.

Feedback was sought from service users in 2025 as part of the All in for Glasgow (AIFG) (phase 2) accommodation-based service redesign program. Although this feedback was from service users from across homelessness accommodation services, there was feedback noted from current Buchanan Lodge residents. Feedback highlighted the both positive and negatives for the care home service model – positives related to the wrap-around support offered, whilst negatives related to the restricted weekly income. One resident was noted as saying: 'This is my permanent home, and I want to stay here'.

Please explain 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* (see below).

*FAIR is an acronym for the following -

- **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.

The services have been reviewed in accordance with the contract management framework. These changes are designed to improve access and outcomes for homeless people.

[11.](#) The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024 came into force on the 16th 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. Go to the [full list of articles](#) to be considered for further 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.

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 options considered need to be reframed against the best possible outcome for children.

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.

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.

This change will have no impact on the rights of children.

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Having completed the EQIA template, please tick the relevant box that you, the 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) ☐

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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 space 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.

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Actions.

From the additional mitigating action requirements sections completed above, please summarise the actions this service will be taking forward or tick the box next to 'No Actions Identified'

No actions identified ☐

Date for completion

Who is responsible? (initials)

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

Lead Reviewer:

Name Angela Dowdalls

Job Title Principal Officer

Signature Angela Dowdalls

Date 6th August 2026

Quality Assurance Sign Off:

Name: Julian Heng

Job Title: Planning and Development Manager

Signature:

A handwritten signature in black ink, appearing to read 'Julian Heng'. The signature is fluid and cursive, with the first name 'Julian' and the last name 'Heng' clearly distinguishable.

Date: 24th August 2026

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.

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NHS Greater Glasgow & 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

Action:

Status:

Completed

Date

Initials

Action:

Status:

Completed

Date

Initials

Action:

Status:

Completed

Date

Initials

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Action:

Status:

Completed

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

Action:

Reason:

To be completed by

Date

Initials

Action:

Reason:

To be completed by

Date

Initials

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

Action:

Reason:

To be completed by

Date

Initials

Action:

Reason:

To be completed by

Date

Initials

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: Alastair.Low@nhs.scot

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