

OFFICIAL 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 alastair.low@ggc.scot.nhs.uk for further details or call 0141 2014560.

Name of Policy/Service Review/Service Development/Service Redesign/New Service:				
Budget proposal for independent sector care home placements				
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 budget that is changing is the Purchased Care Home budget. This is the largest single HSCP budget, has existed for decades and is reviewed each year by social work It is a budget that is utilised to fund nursing and residential care home placements for Glasgow citizens assessed as requiring long-term care who lack the means to fully self-fund. This is approximately 4,000 people at any given point in time.				
Due to the reduction in demand, there will be roughly 40 less placement (to be confirmed) per calendar year. The reduction correlates with the covid-19 pandemic, however we will revisit demand and any unanticipated consequences when we revisit this EQIA in 6 months. Should demand change, then due consideration will be given. An anticipation is that demand may increase over the coming years and this is something that we will monitor closely in line with this EQIA. We don't anticipate any consequences on staffing as this proposal has been made as a result of the decline in demand.				
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.)				
This budget proposal was selected to be EQIA assessed in order to understand if/any implications for individuals who fall into/identify as one of the nine protected characteristic groups. We wanted to understand if there are any implications for the budget proposal; any actions that we may need to take; and, if any gaps existed as we make the changes.				
This budget is used to meet the HSCP's duty of care to individuals with an assessed need for long-term care.				

The change in the budget poses no proportionate risks and no legal risks for the organisation.

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:
Stephen Fitzpatrick	N/A
Callum Lynch	03/03/2022

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):

N/A

		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
1.	What equalities information is routinely collected from	A sexual health service collects service user	The change of the budget is not anticipated to have a significant impact on protected groups. The programme has had an	N/A
	people currently using the	data covering all 9	underspend for the last two years and this reduction will be in	
	service or affected by the policy? If this is a new	protected characteristics to enable	line with recent demand.	
	service proposal what data	them to monitor patterns	We will continue to monitor the potential impact of the reduction	
	do you have on proposed service user groups. Please	of use.	in funding. Should the demand change	
	note any barriers to		Residential Care home providers will comply with equality	
	collecting this data in your submitted evidence and an		processes and gather equality information of service users. Furthermore through social work assessments and reviews,	
	explanation for any		demographic information and equality information is collected	
	protected characteristic data omitted.		through these processes.	

		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
2.	Please provide details of how data captured has been/will be used to inform policy content or service design. Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics. 4) Not applicable	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)	Not applicable as there is no service re-design. However we note the demographic profiles of service users which are overwhelmingly 65+ and overwhelmingly have multiple protected characteristics and meet the criteria. However we will continue to monitor this and take action should any unanticipated impacts arise. Furthermore, between social work assessments and reviews data will be captured of the demographic which will be monitored continuously. The EQIA will be revisited in 6 months and through monitoring of information captured we will look out for any potential impacts.	N/A
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
3.	How have you applied learning from research evidence about the experience of equality groups to the service or	Looked after and accommodated care services reviewed a range of research evidence to help promote	There is no specific engagement on this budget proposal with any groups. This will be something considered moving forward as part of a wider IJB budget-setting engagement process. In due course, the appropriate equality groups and stakeholders with be engaged with. This EQIA will be revisited in due course	N/A

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	Policy?	a more inclusive care environment. Research	to identify any actionable engagement required.	
	Your evidence should show	suggested that young		
	which of the 3 parts of the	LGBT+ people had a		
	General Duty have been	disproportionately		
	considered (tick relevant	difficult time through		
	boxes).	exposure to bullying and		
		harassment. As a result		
	1) Remove discrimination,	staff were trained in		
	harassment and	LGBT+ issues and were		
	victimisation	more confident in asking		
	2) Promote equality of	related questions to		
	opportunity	young people.		
		(Due regard to removing discrimination,		
	3) Foster good relations	harassment and		
	between protected	victimisation and		
	characteristics	fostering good relations).		
		good roudonoj.		
	4) Not applicable			
		Example	Service Evidence Provided	Possible negative impact and
				Additional Mitigating Action
_				Required
4.	Can you give details of how	A money advice service	There is no specific engagement on this budget proposal with	N/A
	you have engaged with	spoke to lone parents	any groups. This will be something considered moving forward	
	equality groups with regard to the service review or	(predominantly women) to better understand	as part of a wider IJB budget-setting engagement process. In	
	policy development? What	barriers to accessing the	due course, the appropriate equality groups and stakeholders with be engaged with. This EQIA will be revisited in due course	
	did this engagement tell you	service. Feedback	to identify any actionable engagement required.	
	about user experience and	included concerns about	to donary any aodonabie engagement required.	
	how was this information	waiting times at the drop		
	used?	in service, made more		
		difficult due to child care		
	Your evidence should show	issues. As a result the		

negative impact and al Mitigating Action Required
al

			011100/12	
	General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics. 4) Not applicable	deactivate in the event of a fire. (Due regard to remove discrimination, harassment and victimisation).		
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
6.	How will the service change or policy development ensure it does not discriminate in the way it communicates with service users and staff? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation	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	It is noted that there has been less demand in the service over the past two years so the reduction brings in in line with the demand. However, should the demand increases then unanticipated impacts will be considered. The HSCP will continue to communicate with independent care homes, there is no redesign for the service simply a change in the volume.	N/A

			011107/12	
	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.	discrimination, harassment and victimisation and promote equality of opportunity).		
7	Protected Characteristic		Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(a)	Age Could the service design or possible disproportionate impact on personage? (Consider any age cut-of service design or policy contemple objectively justify in the evide segregation on the grounds of policy or included in the service	eople due to differences in offs that exist in the ent. You will need to nce section any f age promoted by the	There are no anticipated impacts for service users based on their characteristic of age. Currently, overwhelmingly the age demographic of 65+ is using the nursing/residential care services funded by this budget. The budget ranges between both adult residential care and older people however service users will not be directly affected. The demand for these placements has reduced during the pandemic and the services will still be accessible for people despite their age and the service will continue. Furthermore, following assessment, and	N/A

	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics.	meeting the criteria, all those in need of support will receive it and their needs will be met. We will continue to monitor this and revisit to understand if there are any unanticipated impacts.	
	4) Not applicable		
(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 (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics.	The service will still be available to individuals with disabilities and additional support requirements. The service is not being redesigned therefore they will be in receipt of the same level of care as at present. Independent care homes will have their own accessibility policies to ensure that those with physical and mental disabilities are able to access the service. Any requirements based on someone's disability will be identified through the assessment processes and through social work and any required changes will be made. We know the demographic profile of service users overwhelmingly have disabilities and physical support requirements, therefore this is something that will be monitored for any unanticipated consequences.	N/A
	4) Not applicable		

	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(c)	Could the service change or policy have a disproportionate impact on people with the protected characteristic of gender identity? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics 4) Not applicable	There are no anticipated impacts on Gender identity as a result of the budget proposal. Gender identity is something considered within social work assessment, reviews and delivery of the service.	N/A
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(d)	Marriage and Civil Partnership Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Marriage and Civil Partnership?	No anticipated impact	N/A

	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics 4) Not applicable		
(e)	Pregnancy and Maternity	No anticipated impact	N/A
	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 (tick relevant boxes). 1) Remove discrimination, harassment and		
	victimisation		
	2) Promote equality of opportunity		
	Foster good relations between protected characteristics.		
	4) Not applicable		

	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action
(f)	Race	There are anticipated impacts on race from the budget proposal. Race is part of the social work assessment and reviews and it	Required N/A
	Could the service change or policy have a disproportionate impact on people with the protected characteristics of Race?	will be consistently monitored.	
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).		
	Remove discrimination, harassment and victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected characteristics		
	4) Not applicable		
(g)	Religion and Belief	Religious beliefs are supported through social work assessment, reviews and the delivery of the service. There are no anticipated	N/A
	Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Religion and Belief?	impacts on service user's religion and belief from the budget proposal. Independent care homes will have their own policies on supporting service users regarding their religion and beliefs.	
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).		
	1) Remove discrimination, harassment and victimisation		

	2) Promote equality of opportunity 3) Foster good relations between protected characteristics. 4) Not applicable		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(h)	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 2) Promote equality of opportunity 3) Foster good relations between protected characteristics.	There are to anticipated impacts on service users based on their sex. Whilst we recognise that woman are more likely to be in receipt of care in 65+ residential homes, the level of care they receive is of the same standards as those not of the same sex. The care is not provided by the HSCP and care homes will have their own policies in place.	N/A
(i)	Sexual Orientation Could the service change or policy have a disproportionate impact on the people with the	There is no anticipated impacts on service users based on their sexual orientation. Sexual orientation is supported through social work reviews/assessment processes and the delivery of care.	N/A

	protected characteristic of Sexual Orientation?		
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).		
	1) Remove discrimination, harassment and victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected characteristics.		
	4) Not applicable		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(j)	Socio – Economic Status & Social Class	The change of the budget is not anticipated to have a significant impact on protected groups. The programme has had an	We will revisit the EQIA in 6-12 months to identify any unanticipated
	Could the proposed service change or policy have a	underspend for the last two years and this reduction will be in	impacts.
	disproportionate impact on the people because of their	line with recent demand. We will continue to monitor the	impacts.
	social class or experience of poverty and what	potential impact of the reduction in funding. We also recognise	
	mitigating action have you taken/planned?	service users accessing the service have lower socio economic	
	minganing action have you taken/planned:	status and class, therefore we will revisit the EQIA and monitor	
	The Fairer Scotland Duty (2018) places a duty on public	any unanticipated consequences	
	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.		
(k)	Other marginalised groups	We have identified other marginalised groups and recognised	N/A
		there are currently no anticipated consequences for any of them.	
	How have you considered the specific impact on other	We will continue to monitor this.	

	groups including homeless people, prisoners and exoffenders, ex-service personnel, people with addictions, people involved in prostitution, asylum seekers & refugees and travellers?		
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?	The change of the budget is not anticipated to have a significant impact on protected groups. The programme has had an underspend for the last two years and this reduction will be in line with recent demand.	N/A
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).	We will continue to monitor the potential impact of the proposed funding and consider any unanticipated consequences.	
	1) Remove discrimination, harassment and victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected characteristics.		
	4) Not applicable		
		Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
9.	What investment in learning has been made to prevent	Independent care homes have a responsibility for their own	N/A
	discrimination, promote equality of opportunity and	policy regarding supporting staff and their equality processes	
	foster good relations between protected characteristic	and training. There is no anticipated consequences on care	
	groups? As a minimum include recorded completion	homes ability to support staff with equalities and protected	
	rates of statutory and mandatory learning programmes	characteristic training.	
	(or local equivalent) covering equality, diversity and		
1	human rights.		

10. In addition to understanding and responding to legal responsibilities set out in Equality Act (2010), services must pay due regard to ensure a person's human rights are protected in all aspects of health and social care provision. This may be more obvious in some areas than others. For instance, mental health inpatient care or older people's residential care may be considered higher risk in terms of potential human rights breach due to potential removal of liberty, seclusion or application of restraint. However risk may also involve fundamental gaps like not providing access to communication support, not involving patients/service users in decisions relating to their care, making decisions that infringe the rights of carers to participate in society or not respecting someone's right to dignity or privacy.

The Human Rights Act sets out rights in a series of articles – right to Life, right to freedom from torture and inhumane and degrading treatment, freedom from slavery and forced labour, right to liberty and security, right to a fair trial, no punishment without law, right to respect for private and family life, right to freedom of thought, belief and religion, right to freedom of expression, right to freedom of assembly and association, right to marry, right to protection from discrimination.

Please explain in the field below if any risks in relation to the service design or policy were identified which could impact on the human rights of patients, service users or staff.

No anticipated consequences to service user's human rights on the basis of the budget proposal. The proposal has been reduced in line with the current demand and there are no anticipated consequences to protected groups. We will revisit and continue to monitor the impacts and revisit the EQIA in 6 months.

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*.

Further engagement processes, if required will be inclusive of the Panel Approach and take into consideration a human rights based approach. Engagement and consultation will seek to engage with protected characteristic groups and those with lived experience of the services. Furthermore, we will look at any unanticipated consequences on staff and those delivering the service.

- 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:

Sporteringsool	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 opp	portunities for developments in their own services.		
N/A			
Actions – from the additional m summarise the actions this serv	itigating action requirements boxes completed above, please vice will be taking forward.	Date for completion	Who is responsible?(initials)
the implementation and ongoing months for review as a minimum	e proposed budget and decision there will be a consideration of monitoring processes. We will be revisiting the EQIA in 6 to understand any unanticipated consequences, if any and ing. Currently, there are no anticipated consequences to service	07/03/2022	
Ongoing 6 Monthly Review pl	ease write your 6 monthly EQIA review date:		
Lead Reviewer: EQIA Sign Off:	Name Job Title Signature Date		

Once complete please e-mail a copy of the assessment to <u>alastair.low@ggc.scot.nhs.uk</u> for quality assurance (QA). Please note QA offers advice on content and is an optional process for HSCPs who can proceed directly to publication if required.

Quality Assurance: Name

Job Title Signature Date



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:

	Co	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 Serv	rice/Policy and	
Please detail any outstanding activity with regard to required			
Please detail any outstanding activity with regard to required eason for non-completion	To be C	completed by	
Please detail any outstanding activity with regard to required eason for non-completion Action:	To be C	completed by	
Status: Please detail any outstanding activity with regard to required reason for non-completion Action: Reason:	To be C	completed by	

		To be cor	To be completed by	
		Date	Initia	
Action:				
Reason:				
Action:				
Reason:				
Please detail anv	discontinued actions that were originally planned and reasons:			
Action:				
Reason:				
Action:				
Reason:				
Please write you	r next 6-month review date			
Name of complet	ing officer:			
Name of complet	ing officer:			