

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 Homelessness Outreach Services – All In For Glasgow

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.

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.)

Glasgow City Council has a statutory duty for the prevention and alleviation of homelessness in Glasgow. These duties are discharged through Glasgow City Health and Social Care Partnership under the direction of the IJB. In November 2023 Glasgow City Council declared a housing emergency.

Commissioned Homelessness services were previously contracted to the Glasgow Alliance to End Homelessness [“The Alliance”] to manage on behalf of the HSCP. The Alliance included representatives of providers and the HSCP. When the Alliance ended in 2023, responsibility for procurement and contract management of purchased Homelessness services were transferred to HSCP Commissioning team. Commissioned homeless services work alongside HSCP casework and other operational staff as well as directly provided services to meet the council’s statutory duties in respect of homelessness.

Broadly these services fall into two categories – accommodation based services and outreach services. The latter category encompasses a number of delivery models including flexible outreach support in the individual’s homes, outreach support linked to a RSL tenancy, Housing First, and the provision of ‘hubs’. These outreach services are delivered by a number of social care providers under contracts operating on a legacy basis. The aim of these services is to prevent homelessness by supporting individuals to maintain their current accommodation arrangements or by supporting previously homeless individuals who are being resettled into new accommodation.

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Building on previous work undertaken by the Alliance, Glasgow City Integrated Joint Board approved the review and redesign of homelessness services in the city using a co-production approach aligned to the principles of ethical commissioning. Homeless Network Scotland were contracted to lead this work under the banner of All in for Glasgow [“AIFG”]. Outreach services were selected for the first phase of AIFG as work already undertaken by the Alliance provided an advanced starting point for the redesign of these services. The collaborative approach was demonstrated by the invitation to partners from across homelessness in Glasgow, and Scotland, to participate in five sessions focused on the outreach support services: These sessions had significant participation from individuals with lived and living experience through the Glasgow Homelessness Involvement & Feedback Team (GHIFT).

Homeless outreach services are provided to a wide range of people across Glasgow. An EQIA is being produced to support the redesign and procurement of these services and to identify any ways that the redesign may impact those with protected characteristics and how any impact can be mitigated while ensuring that the Council’s statutory duties in relation to Homelessness while recognising the requirement for the HSCP to maintain a balanced budget. This EQIA is restricted to the outreach services noted above. It is expected that there will be parallel work undertaken in the future in relation to accommodation based services.

The redesign of services under AIFG has been undertaken in alignment with the principles of ethical commissioning and co-production has been at the centre of all redesign activity. The voice of individuals with lived and living experience of Homelessness has been at the heart of this activity. The aim of AIFG is to propose effective, outcome focused homelessness services that have trauma informed and human rights approaches while being delivered within the available financial envelope. It is recognised within the AIFG process that there is a need to streamline referral and support processes to improve access to and consistency of support. The need to deliver this support with a clear focus on preventing and reducing homelessness has been emphasised throughout the AIFG programme. The name given for the redesigned services is Housing WAYfinder, which was suggested by those with lived experience of homelessness.

The Service Specification for the Housing WAYfinder services is explicit in its promotion of equality. Provider are expected to have an understanding of the complex needs associated with homelessness. Individuals who experience homelessness may present with a range of support needs such as:

- history of trauma
- current or previous addiction including intravenous drug use
- vulnerability to social isolation, harm or exploitation
- mental and physical health needs
- affected by gender-based violence
- issues around gender or sexual orientation
- suffering effects of religious, racial, gender based or other discrimination
- language support and communication support needs due to literacy or language barriers
- younger people, some of whom will be care experienced

Housing WAYfinder will:

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- embody the no wrong door approach and people will be able to access the service at any stage
- embed the suggested recommendations by the Independent Review of Adult Social Care into service delivery
- support people face to face, on the street, in their accommodation or their community, and will also be available remotely
- explore options to co-locate with existing housing advice hubs/day centres or provide/co-provide a WAYfinder hub
- provide out of hours support in partnership with the Glasgow and Partners Emergency Social Work service.
- co-locate with existing statutory services.
- offer different tiers of support which will be able to flex up and flex down as a person's needs change.
- employ the principal of the 'sticky' support team. The same team of named workers supporting people through their entire homeless journey.
- deliver seamless transition between support providers.
- offer an intensive street outreach service for people who rough sleep.
- offer access to funds for people in crisis.

The focus within the service redesign, directed by lived experience, has been to maintain consistency of support where possible and therefore providers will be expected to have experience of and deliver appropriate services to all of the above as well as other protected characteristics. Services will be expected to make adjustments in line with the requirements of the Equality Act 2010. The principal changes as a result of the redesign are

- Align the current disparate outreach support arrangements into a unified service where a 'no wrong door' approach is offered for individuals who require the service
- Employ the principal of a 'sticky' support team who provide consistent delivery during an individual's journey through homelessness
- Consistency of delivery and effective transition will be facilitated by shared processes across each of the partner providers and the creation of a Provider Forum will ensure effective co-provision
- Deliver a trauma informed approach to ensuring that individuals are supported out of homelessness effectively
- Encourage co-location and partnership working with local communities and existing statutory services including Health & Social Care Connect
- Deliver standard and enhanced support that can flex up and down in response to the needs of individuals
- Provide seamless support to individuals even where multiple partner providers are involved
- Allow the future development of the service including tenancy sustainment and access to funds and training opportunities for individuals

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: David Fernie, Principal Officer, Homelessness Commissioning

Date of Lead Reviewer Training: 25/04/2024

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>	<i>Service Evidence Provided (Which equality issue requires to be addressed)</i>	<i>Possible negative impact and Additional Mitigating Action Required</i>
1.	What equalities information is routinely collected from people currently using the service or affected by the policy? If this is a new service proposal what data do you have on proposed service user groups. Please note any barriers to collecting this data in your submitted evidence and an explanation for any protected characteristic data omitted.	The Homeless Monitor collates Scotland wide statistical information on homeless households. 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.’	Under the Council’s Contract Management Framework, providers must show their awareness of their responsibilities in respect of equalities and confirm their commitment to regular review of practice in relation to equality considerations. Glasgow City HSCP Commissioning will be undertaking annual monitoring of equalities data from providers. This return will be anonymised but will be underpinned by the providers own procedures to collect data from their service users across all protected characteristics.

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			Commissioning Equalities Data • PSR issued six monthly with standard equalities questions to ensure contract compliance • Commissioning annual equalities return – detailed service specific equalities information. First iteration due in October 2024 Glasgow City HSCP collects a range of information in relation to Homelessness. In the most recent annual data, of the 6708 homelessness applications 5063 households were between the ages of 26 and 59 (75%). 19% of the homeless population is between the ages of 18 and 25. Young people are therefore disproportionately represented within the homeless population in Glasgow. Of the 6708 homeless applicants, 72% are single (4816). 16% are from single parents, 91% of whom are women. Approximately 30% of homelessness applicants were recorded as coming from a Black, Asian, and Minority Ethnic community. This disproportionate level of homeless applications is primarily a consequence of the route into settled accommodation for households receiving refugee status in the city.	Monitoring of the access and utilisation of these services by specific groups will be undertaken in line with the requirements of the Equality Act 2010. A culture of continuous improvement will be fostered in these services.
		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.	<i>(Due regard promoting equality of opportunity)</i>	The data has informed the scope of the redesign and procurement approach including capacity and delivery methods. Specific attention has been made in relation to ease of access to support including the option to self-refer for outreach supports through the WAYfinder service.	Under the Council's Contract Management Framework, providers must show their awareness of their responsibilities in respect of equalities and confirm their commitment to regular review of

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	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 ☐		All of the general duties have been considered and the service design has been created in line with these duties.	practice in relation to equality considerations. Specific needs due to protected characteristics will be identified during the referral and assessment process and providers will be required to make appropriate adjustments to the delivery of the Service. Monitoring of the access and utilisation of these services by specific groups will be undertaken in line with the requirements of the Equality Act 2010. A culture of continuous improvement will be fostered in these services.
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
3.	How have you applied learning from research evidence about the experience of equality groups to the service or Policy? Your evidence should show which of the 3 parts of the	<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</i>	Hard Edges research details the extent and nature of severe and multiple disadvantage people in Scotland can face. <u>Hard Edges Scotland 2019</u> • 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.	Provider of the WAYfinder service will be expected to deliver services across a broad range of individuals given the multi-dimensional aspects of homelessness. They will therefore be expected to deliver a holistic service which is appropriate for all groups while being sensitive to the

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	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 ☐	<i>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>	Although highest risks noted in above demographic group, younger people and those from a minority ethnic background were also more likely to experience homelessness and interface with homelessness services. A number of other documents were reviewed as part of the redesign of homeless outreach services • R RTP Guidance and National Principles June 2019 • Tackling Homelessness in Scotland following the Coronavirus Pandemic – Recommendations from HARSAG • The Interim Code of Guidance on Homelessness • Ending Homelessness Together – Scottish Government • Preventing Homelessness in Scotland • Glasgow City RTP 2019 - 2024 • Relevant legislation Evidence shows homelessness is a multidimensional experience and is not simply just a lack of housing. Homelessness is an intersection of multiple issues, and the providers of the WAYfinder service will provide support holistically.	differing needs and expectations of relevant groups. At all times, the focus of services is on outcomes of preventing and reducing homelessness and these outcomes will be achieved through a sensitivity to the needs and requirements of the wide range of individuals who experience homelessness.
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
4.	Can you give details of how you have engaged with equality groups with regard to the service review or policy development? What did this engagement tell you about user experience and		Homeless Network Scotland delivered a programme with the HSCP that had the voice of lived and living experience at its centre. The AIFG programme had full participation of individuals who are experiencing homelessness, or have in past, in the service development activity. GHIFT was central to the AIFG programme and its activity. The AIFG programme has included a sequence of in person development sessions where a range of	The feedback from individuals has been included during the development of key documents for the redesign of the service. For example, the highlighted issues around accessibility of services and consistency of support have been

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	how was this information used? 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 ☐		people with lived or living experience of homelessness have delivered presentations and contributed to table discussions and fed back to the wider audience. Key feedback points from those with lived or living experience as included the importance of ‘sticky’ workers or teams, the removal of barriers to access services, and the need for a trauma informed approach where individuals are not required to repeat their history and circumstances as they journey through the homelessness process. This builds on previous work by the Alliance (“YOU – Your Outreach Unified”) which also had the voice of lived and living experience at its core. The Council’s Contract Management Framework ensures that the voice of service users is included as contracts progress and this will be monitored by Commissioning staff in line with guidance.	reflected in the service specification while also acknowledging the practical operational requirements for providers. In relation to accessibility of services, the ability to self-refer has been highlighted but within the context of agreed routes to obtain support such as Health and Social Care Connect. Consistency of support has also been emphasised but as a ‘sticky teams’ rather than workers as it is acknowledged that providers would have significant logistical difficulties in maintaining individual worker allocations across the life of a journey through homelessness. Where there has been varying feedback received from development session – for example in relation to the provision of a ‘hub’ building – full consideration has been given to how the feedback from service users can be used to provide a model which offers an equivalent service and still meets the expectations of participants.
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		<i>Example</i>	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
5.	Is your service physically accessible to everyone? If this is a policy that impacts on movement of service users through areas are there potential barriers that need to be addressed? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation ☒ 2) Promote equality of opportunity ☒ 3) Foster good relations between protected characteristics. ☐ 4) Not applicable ☐	<i>(Due regard to remove discrimination, harassment and victimisation).</i>	Homeless outreach services are usually delivered in service user's own homes. This accommodation will generally be identified through the assessment process which will identify any specific needs such as physical capacity and related accessibility requirements. Evidence indicates that there is a shortage of accessible properties to meet the needs of disabled households in Glasgow due to the challenges of the built environment of the city. This highlights the benefit of outreach services in maintaining current accommodation where it is suitable as there can be difficulty in finding alternative suitable accommodation where an individual becomes homeless.	Maintaining tenancies in suitable accommodation and avoiding the need to identify alternative housing will be key performance indicator for providers. Providers will also be expected to assist individuals who move to new tenancies including assistance to resolve any physical accessibility issues.
		<i>Example</i>	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
6.	How will the service change	<i>(Due regard to remove</i>	Services will be expected to support service users with sensory	Information in multiple formats will be

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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 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	<i>discrimination, harassment and victimisation and promote equality of opportunity).</i>	impairments or learning disabilities as well as service users who do not speak or read English. The proposed redesign will not negatively impact those who have difficulty communicating. It is anticipated that the introduction of a streamlined, simpler referral and assessment process will reduce communication barriers and the ability to self-refer for preventative outreach support through Health and Social Care Connect will further reduce issues with communication. Health and Social Care Connect offers interpretation services for people who do not use English as a first language. BSL interpreters are also available. While individuals can request a service digitally, there is no requirement to do so and there is the option to ask for a service in person to reduce the risk of digital exclusion. Support workers will be able to make a referral on behalf of an individual to reduce any barriers to access further. Written information on homelessness services is available to be accessed by people who do not use English as their first language.	updated to reflect the revised model of outreach services. Multiple routes to request support will be available to promote ease of access to the WAYfinder service. Services will be required to put appropriate training in place for their staff. The service will operate a 'no wrong door' approach which will reduce opportunities for a disproportionate impact on individuals who have difficulty accessing services due to communication issues. Providers will be monitored to ensure that Key Performance Indicators are met. GCHSP will undertake annual equality monitoring of services. A communication strategy will be incorporated into the implementation plan for the contract for these redesigned services to ensure that information on changes are effectively delivered including to those who may have difficulty accessing such information.
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	show how the service review or policy has taken note of this.			
7	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required	
(a)	Age Could the service design or policy content have a disproportionate impact on people due to differences in age? (Consider any age cut-offs that exist in the service design or policy content. You will need to objectively justify in the evidence section any segregation on the grounds of age promoted by the policy or included in the service design). 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 ☐	The WAYfinder service will deliver to adults aged 18 and over. An age profile of homeless applicants shows 16 - 17 = 74 18 – 25 =1281 26 - 59 = 5063 60+ = 290 Total = 6708 As at 31 March 2023 3348 households were in temporary accommodation and 35% of these include either children or someone who is pregnant. Homeless services aim to minimise stays in unsuitable accommodation for families and households with a pregnant person. Outreach provision is an important support service to ensure that such households do not require such accommodation.	Given the over representation of young people experiencing homelessness, there will be a separate, specific service redesign programme for individuals aged 16-25. This will have a specific focus on the needs of younger adults experiencing homelessness. Work will be undertaken to ensure that there is clear, effective provision for transition between this proposed service for younger people and the WAYfinder service. Children and pregnant individuals will be supported as part of a holistic approach to homeless households with clear escalation routes to other services as required. Providers will be monitored to ensure that Key Performance Indicators are met. GCHSP will undertake annual equality monitoring of services.	

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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 (tick relevant boxes). 1) Remove discrimination, harassment and victimisation ☒ 2) Promote equality of opportunity ☒ 3) Foster good relations between protected characteristics. ☐ 4) Not applicable ☐	Homeless outreach services are usually delivered in service user's accommodation. This accommodation will generally be identified through the assessment process which will identify any specific needs such as physical disability and related accessibility requirements. Evidence indicates that there is a shortage of accessible properties to meet the needs of disabled households in Glasgow due to the challenges of the built environment of the city. This highlights the benefit of outreach services in maintain current accommodation where it is suitable as there can be difficulty in finding alternative suitable accommodation where an individual becomes homeless. The redesigned service will continue to support some individuals with a learning disability and will link with other relevant services and organisations as required. There were 6,708 homelessness applications in Glasgow in 2022/23. Evidence from Homelessness Network Scotland shows that c. 50% of the individuals who make an application for homelessness have no support needs other than housing. Around 30-35% of homelessness support can be provided in mainstream housing with flexible outreach support as proposed in the standard support level of the WAYfinder service. Another 10-15% of individuals would be best suited to a model aligned with the principals of Housing First which the WAYfinder service also provides for. There remains a small proportion of individuals who are best supported through a supported accommodation model which will be the subject of future redesign work. Scotland wide data suggests that around 30% of homeless applications are made by individuals with a mental health issue. Individuals with a learning disability made 4% of applications	Providers will be monitored to ensure that Key Performance Indicators are met. GCHSP will undertake annual equality monitoring of services. A communication strategy will be incorporated into the implementation plan for the contract for these redesigned services to ensure that information on changes are effectively delivered including to those who may have difficulty accessing such information. No additional mitigation actions are necessary in relation to this protected characteristic as there will be no negative impact.

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		while those with a physical disability made 7% of applications. No disproportionate impact on disabled people is anticipated as a result of this service redesign.	
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(c)	Gender Identity Could the service change or policy have a disproportionate impact on people with the 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 ☐	While some accommodation based homelessness services are gender specific, there has been no formal commissioning of a gender specific homeless outreach service. Providers will be expected to adopt a trauma informed approach to service delivery. It is acknowledged that such individuals may have a mistrust or lack of faith in services and the service design includes an enhanced level of support to assist such individuals to re-engage with statutory and non-statutory services. Gender identity is generally not a factor when outreach support is being arranged or delivered however there will remain the option for support to be delivered by workers of a specific gender where that is appropriate. It is acknowledged that Trans individuals are more likely to experience homelessness than the general population in line with wider statistics relating to LGBT people.	There will be a separate, specific service redesign programme for individuals aged 16-25. This will have a specific focus on the needs of younger adults experiencing homelessness. This includes any specific needs of Trans young people. Given the likely over representation of Trans people in homelessness in general, there will be an expectation that providers of this service will be sensitive to discrimination, harassment and victimisation and assist those individuals to achieve equality of opportunity. GCHSP will undertake annual quality monitoring of services.
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(d)	Marriage and Civil Partnership	Delivery of homeless outreach support will continue to be delivered on a household basis. There is therefore no	Providers will be monitored to ensure that Key Performance Indicators are

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	Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Marriage and Civil Partnership? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics 4) Not applicable ☒	anticipated disproportionate impact on people who are married or in a civil partnership or on those who are not.	met. GCHSP will undertake annual equality monitoring of services. An individual's marital or civil partnership status is not a consideration of the delivery of the redesigned service and there will be no negative impact. Additional mitigation actions are not required.
(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 (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity	As noted above, 35% of households presenting as homeless include children or a pregnant person. Delivery of homeless outreach support will continue to be delivered on a household basis irrespective of pregnancy or maternity status. There is therefore no anticipated disproportionate impact on people who are married or in a civil partnership or on those who are not. However, the HSCP acknowledges that homelessness can impact pregnant individuals in differently compared to others and services will continue to meet the particular needs of households with pregnant people as appropriate. The Service Specification for the WAYfinder service includes the requirement for providers to support individuals with needs	Providers will be monitored to ensure that Key Performance Indicators are met. GCHSP will undertake annual equality monitoring of services. An individual's pregnancy or maternity status is not the subject of a negative impact as a result of the redesign of the service delivery. Additional mitigation actions are not required.

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	3) Foster good relations between protected characteristics. 4) Not applicable ☒	arising from pregnancy and maternity.	
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(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 (tick relevant boxes). 1) Remove discrimination, harassment and victimisation ☒ 2) Promote equality of opportunity ☒ 3) Foster good relations between protected characteristics ☐ 4) Not applicable ☐	The housing emergency declared by Glasgow City Council arose, in part, as a result of the decision by the Home Office to fast-track up to 2500 asylum decisions in Glasgow. This has meant that individuals from a Black, Asian, and Minority Ethnic background are disproportionately represented (c. 30%) of the population who are homeless. Providers will be expected to work with the HSCP's Asylum and Refugee Service to assist individuals who are recent citizens in the city to settle into communities and access relevant services to ensure that their accommodation is sustainable. Routes to access support will include the availability of interpretation services for people who do not use English as a first language. BSL interpreters are also available. Scotland wide data shows that approximately 11% of homeless applications in 2022/23 were from Black, Asian, and Minority Ethnic individuals. Given Glasgow's diverse population, in comparison to the rest of the country, it is likely that this proportion is higher within the city. Providers will ensure that appropriate interpreting support is providing for anyone who does not have English as a first language	The service will operate a 'no wrong door' approach which will reduce opportunities for a disproportionate impact on Black, Asian, and Minority Ethnic individuals through difficulty accessing services. Providers will be monitored to ensure that Key Performance Indicators are met. GCHSP will undertake annual equality monitoring of services.

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(g)	Religion and Belief Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Religion and Belief? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation ☒ 2) Promote equality of opportunity ☒ 3) Foster good relations between protected characteristics. ☐ 4) Not applicable ☐	As outreach services are generally delivered within individual's own accommodation, there is no substantial impact in relation to the service user's religion or belief. However it is recognised that Black, Asian, and Minority Ethnic individuals are disproportionately represented in people experiencing homelessness. Therefore providers will be skilled and experienced in supporting individuals with a wide range of religion and beliefs. Outreach services will be expected to assist individuals to link in with communities, including faith groups, through relevant signposting where appropriate.	Providers will be monitored to ensure that Key Performance Indicators are met. GCHSP will undertake annual equality monitoring of services. An individual's religion or belief is not the subject of a negative impact as a result of the redesign of the service delivery. Additional mitigation actions are not required.
	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).	It is noted that in 2022/23 62% of applicants were men, therefore any change or pressures on the services are more likely to impact upon men. Evidence shows that gender based violence and trauma are common factors for some individuals who experience homelessness. It is one of the five 'disadvantages' noted in the Hard Edges Scotland 2019 report. Providers will be expected to adopt a trauma informed approach	Providers will be monitored to ensure that Key Performance Indicators are met. GCHSP will undertake annual equality monitoring of services. An individual's protected characteristic of sex is not the subject of a negative impact as a result of the

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	1) Remove discrimination, harassment and victimisation ☒ 2) Promote equality of opportunity ☒ 3) Foster good relations between protected characteristics. ☐ 4) Not applicable ☐	to service delivery. It is acknowledged that such individuals may have a mistrust or lack of faith in services and the service design includes an enhanced level of support to assist such individuals to re-engage with statutory and non-statutory services. While some women only accommodation based homelessness services have been commissioned and operate within Glasgow, there has been no formal commissioning of a women only homeless outreach service. Providers will be expected to ensure equality of access to services including the proposed hub across all sexes. Although the sex of an individual is generally not a factor when outreach support is being arranged or delivered, there will remain the option for support to be delivered by workers of a specific sex where that is appropriate.	redesign of the service delivery. Additional mitigation actions are not required.
(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 (tick relevant boxes). 1) Remove discrimination, harassment and victimisation ☒ 2) Promote equality of opportunity ☒ 3) Foster good relations between protected characteristics. ☐	LGBT young people are at a higher risk of homelessness than their non-LGBT peers. 24% of the young homeless population in the UK identify as LGBT according to 2015 research by Albert Kennedy Trust. LGBT young people are therefore significantly more likely to be in contact with a homeless outreach service. There is currently no official data in relation to LGBT adults who are homeless in Scotland. UK studies (Fraser et al 2019) suggests that 25% of homeless persons in the UK may be LGBT despite composing only 5% of the total population. The delivery of supports including advocacy, signposting, and support for mental wellbeing will be delivered in the context of the circumstances of the individual including any higher risk of homelessness for an individual due to their sexual orientation.	Given the likely over representation of LGBT people in homelessness in general, there will be an expectation that providers of this service will be sensitive to discrimination, harassment and victimisation and assist those individuals to achieve equality of opportunity. GCHSP will undertake annual equality monitoring of services, guidance and protocols for the WAYfinder service in relation to LGBT individuals may be developed from this analysis of this data.

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	4) Not applicable ☐		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(j)	Socio – Economic Status & Social Class Could the proposed service change or policy have a disproportionate impact on the people because of their social class or experience of poverty and what mitigating action have you taken/planned? The Fairer Scotland Duty (2018) places a duty on public bodies in Scotland to actively consider how they can reduce inequalities of outcome caused by socioeconomic disadvantage in strategic planning. If relevant, you should evidence here steps taken to assess and mitigate risk of exacerbating inequality on the ground of socio-economic status. Additional information available here: Fairer Scotland Duty: interim guidance for public bodies - gov.scot (www.gov.scot)	Glasgow City HSCP acknowledges that homelessness is both a cause and a result of social and health inequality and poverty. The redesign of homelessness services, in particular the strong focus on community links, should assist in reducing the impact on individuals who are in poverty. The WAYfinder services will have Key Performance Indicators that focus on the prevention of initial homelessness as well as breaking the cycle of repeat homelessness which exacerbates poverty, social exclusion, and health inequalities. Some of the suggested support areas within the WAYfinder service that aim to tackle social exclusion or poverty related issues include: • Advocacy • Housing Advice • Signposting • Supporting healthy lifestyles and exercise • Supporting mental wellbeing and mindfulness • Support to access volunteering and employment • Support to access training and education • Tenancy sustainment support and guidance	The redesign of homeless outreach services affords an opportunity to focus on mitigating the significant negative impacts that homelessness causes. The WAYfinder service will assist individuals to move out of crisis and address some of the drivers of their socio-economic status. Providers will be monitored to ensure that Key Performance Indicators are met. GCHSP will undertake annual equality monitoring of services.
(k)	Other marginalised groups How have you considered the specific impact on other groups including homeless people, prisoners and ex-	In general, marginalised groups are significantly more susceptible to homelessness. This includes ex-offenders, intravenous drug users and many others.	The service will operate a 'no wrong door' approach which will reduce opportunities for exclusion of marginalised groups.

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	offenders, ex-service personnel, people with addictions, people involved in prostitution, asylum seekers & refugees and travellers?	Many people experiencing homelessness will have complex needs. Scottish Government data from 2017-18 shows that 47% of homeless households will have one or more support needs. Asylum seekers are also susceptible to homelessness as a result of the decision by the Home Office to fast-track up to asylum decisions. Individuals from a Black and Minority Ethnic background are disproportionately represented (c. 30%) of the population who are homeless. The All In For Glasgow approach to service redesign, addressed the need to consider a variety of marginalised groups through the use of 'personas' which were co-produced with stakeholders including those with lived and living experienced. Those personas shaped the redesign of the service. Some of the suggested support areas within the WAYfinder service that aim to assist marginalised groups include: • Advocacy • Addiction and recovery support and signposting • Harm reduction advice – including Naloxone administration. • Housing Advice • Signposting • Supporting healthy lifestyles and exercise • Supporting mental wellbeing and mindfulness • Support to access volunteering and employment • Support to access training and education • Tenancy sustainment support and guidance	The use of a range of personas in the AIFG redesign process has allowed the design of the WAYfinder service to be inclusive and comprehensive. Providers will be monitored to ensure that Key Performance Indicators are met. GCHSP will undertake annual equality monitoring of services.
8.	Does the service change or policy development include an element of cost savings? How have you managed	The WAYfinder service will replace a range of existing service provision including	Additional mitigation actions are not required.

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	this in a way that will not disproportionately impact on protected characteristic groups? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics. 4) Not applicable x ☐	• Alcohol Outreach Resettlement Service • Community Directions • Day centre provision on Albion Street • Flexible Homeless Outreach Support Service (FHOSS) • Housing First It is anticipated that the budget for the replacement service will be equivalent to the current provision. The WAYfinder service has been designed to ensure equality of access and provision and therefore the changes to the budget are not expected to have a negative impact in relation to protected characteristic groups. The ability of individuals to self-refer to the WAYfinder service and the 'no wrong door' approach to the service should improve access for those in protected characteristic groups.	
		Service Evidence Provided	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 recorded completion rates of statutory and mandatory learning programmes (or local equivalent) covering equality, diversity and human rights.	The commissioning of the WAYfinder service will aim to have provider staff that are skilled, confident, and competent when working with diverse need of the multi-faceted group of people who experience homelessness. Providers will be expected to ensure that each protected characteristic group has equality of opportunity and that their staff group aims to be reflective of the communities that they are working in. GCHSCP Commissioning will monitor actions in relations to equality through its Contract Management Framework as well as the planned annual equality monitoring activity.	GCHSCP will support provider and share good practice and opportunities in relation to equalities. Ongoing routine monitoring will ensure compliance with requirements with enhanced actions undertaken on a proportionate as needed' basis following an assessment of risks.

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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 specific risks in relation to Human Rights were identified as part of the AIFG service redesign with people with lived and living experience at the centre of that process. It is acknowledged that some protected groups are over represented in the wider homeless population and the WAYfinder service will ensure equality of opportunity and remove barriers to access. GCHSCP monitoring will ensure compliance with this while a culture of review and continuous improvement will seek to ensure that best practice is maintained. The service will operate in compliance with the Human Rights Act and the Equality Act.

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* .

Homeless Network Scotland were commissioned to undertake the All in for Glasgow review for GCHSCP. This co-produced programme was closely aligned to the principles of ethical commissioning. The participation of people who had experienced or were experiencing homelessness in the analysis and design of the service was

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- **Facts:** What is the experience of the individuals involved and what are the important facts to understand?
- **Analyse rights:** Develop an analysis of the human rights at stake
- **Identify responsibilities:** Identify what needs to be done and who is responsible for doing it
- **Review actions:** Make recommendations for action and later recall and evaluate what has happened as a result.

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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)

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11. If you believe your service is doing something that 'stands out' as an example of good practice - for instance you are routinely collecting patient data on sexual orientation, faith etc. - please use the box below to describe the activity and the benefits this has brought to the service. This information will help others consider opportunities for developments in their own services.

--

Actions – from the additional mitigating action requirements boxes completed above, please summarise the actions this service will be taking forward.

Date for completion

Who is responsible?(initials)

--	--

Ongoing 12 Monthly Review please write your 12 monthly EQIA review date:

--

Lead Reviewer:

EQIA Sign Off:

Name David Fernie

Job Title Principal Officer, Homelessness Commissioning

Signature

Date

Quality Assurance Sign Off:

Name

Alastair Low

Job Title

Planning Manager

Signature

Alastair Low

Date

28/08/24

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**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:			

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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:

If you would like to have your 6 month report reviewed by a Quality Assuror please e-mail to: alastair.low@ggc.scot.nhs.uk

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