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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. 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 Equality@ggc.scot.nhs.uk for further details or call 0141 2014560.

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

Provision of a Digital Telecare Service

Is this a: Current Service ☐ Service Development ☐ Service Redesign ☒ New Service ☐ New Policy ☐ Policy Review ☐

Description of the service & rationale for selection for EQIA: (Please state if this is part of a Board-wide service or is locally driven).

Glasgow's telecare service makes use of technology enabled care to support a diverse service user group to remain living independently at home and to summon assistance in an emergency. The service is mainly used by older people or people with disabilities, but it can also support people who have significant health problems. It is a locally driven, covering all Glasgow City postcodes. The service is used by approx. 8000 service users.

The UK's telecommunications regulator (Ofcom) has announced that the UK will transition from analogue to digital telephony due to the planned retirement of analogue phone lines by the end of 2025. Currently Glasgow's telecare service runs on analogue phone lines and thus necessitates the transformation of the telecare service to a digitally compatible model prior to 2025. This will involve the transfer to a digital Alarm Receiving Centre Platform and the purchase and installation of new digitally compatible devices, which will replace the existing analogue equipment in service users' homes.

Glasgow is working closely with the Digital Office for Scottish Local Government, ensuring it is following best practice and guidance on the digital transfer. The Digital Office, as digital transformation partners are working with local authorities across the whole of Scotland to ensure a "Once for Scotland" approach. The retirement of analogue telephony will impact all telecare service providers in Scotland. Any delay in transfer to a digital system will impact on Glasgow's ability to provide a telecare service. As telecommunication providers upgrade to digital lines the ability of existing analogue equipment to function over these lines becomes unstable, potentially leading to loss of life. Telecommunication providers have announced that service users of telecare will be deferred until the end of their switchover programmes. The HSCP has developed a comprehensive Analogue to Digital project plan and will aim to meet key project milestones in a timeous manner to ensure continued service user safety. A project risk log will be continually updated with controls and mitigating actions.

The installation of new digital equipment will be a functional change, to enable the continuation of the service into the digital age and will not result in a change to service provision. Service users will be supplied with digitally compatible equipment which is similar in appearance and operation (box with button and pendant alarm) unlikely to require any service user upskilling.

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Digital Telecare Charge

The service is subject to a weekly charge of £3.78 per week. The implementation of a full digital service will require a revision to this charge to enable cost recovery for the new service.

Financial modelling has determined that the ongoing cost of providing a digital telecare service will increase to approx. £11 per connection per week. The requirement for digital devices to use SIM card connectivity generates additional running costs which will require to be borne by GCHSCP. (approx. £4.00 per month)

In preparation for the transition to digital telecare and the increased revenue costs this will entail, the IJB report of 13th March 2023 approved a new digital telecare charge of £7.50 per week. The digital telecare charge was proposed to **part** offset the increased cost of digital connectivity. Current plans are to implement the charge in 24/25, however an implementation date has still to be established.

When charging for telecare services was first introduced in 2012, the service experienced a 25% withdrawal rate. There is a risk that vulnerable service users could cancel their telecare service following the introduction of the new digital charge, consequently impacting other areas of health and social care service provision.

Completing this EQIA will help to identify the impact the transition to a digital service may have on service user groups and mitigating actions required.

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.). Consider any locally identified Specific Outcomes noted in your Equality Outcomes Report.

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: Nicola Dolan	Date of Lead Reviewer Training: 3/11/23
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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):

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Nicola Dolan – Project Manager Digitisation, Glasgow City Council
 Liam Herbert – Head of Planning and Strategy (OP & South)
 Alexandra McGowan – Service Manager Care Services, Glasgow City Council
 Chris Barton – Alarm Centre Manager, Glasgow City Council
 Michael Gillespie – Principal Officer, Telecare Service, Glasgow City Council

		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
1.	What equalities information is routinely collected from people currently using the service or affected by the policy? If this is a new service proposal what data do you have on proposed service user groups. Please note any barriers to collecting this data in your submitted evidence and an explanation for any protected characteristic data omitted.	A sexual health service collects service user data covering all 9 protected characteristics to enable them to monitor patterns of use.	<p>Information on age is held within the Telecare ARC platform which can be easily reported on.</p> <p>Information on gender, religion, ethnicity, marital status and disability (though the main client group) are collected within client records on the Care First recording system.</p> <p>There is no standard reporting template enabling regular reporting of this data from Care First. For the purposes of this EQIA a one-off report was run from Care First detailing the protected characteristics of current telecare service users</p>	<p>Mitigating Action would be to request and review this Care First report on a regular basis to give insight into the protected demographics of telecare service users, which can be used in planning for future service delivery.</p> <p>Identify if more detailed information on disabilities can be recorded and reported on from Care First or new alarm receiving centre platform once in use.</p>
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
2.	Please provide details of how data captured has	A physical activity programme for people	Service user data was reviewed and found the majority of service users were older, female and single. There is an	The vulnerabilities of the service user group may make the practicalities of

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	<p>been/will be used to inform policy content or service design.</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>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)</p>	<p>expectation that service users are living with a disability or long-term condition. Our records should that at least 28% of service users are living with a disability, although we expect the level to be much higher.</p> <p>Older, female, single service users are more likely to live in poverty. On reviewing the location of service users' properties, we see that 65% are located in the 3 most deprived areas in Glasgow (SIMD) compared with 41% of the population in Glasgow as a whole.</p>	<p>replacing equipment more complex.</p> <p>The development of an installation and communication plan will consider the vulnerabilities of this group. This work will be supported by the HSCP's communications team.</p> <p>An increase to the telecare service charge may impact on service users' ability to pay.</p> <p>Steps have been taken to mitigate against the cost to the service user. The connection is estimated to be £11 per month/week, this will be reduced to £7.50 for the service user. However, it is noted that this is still an increase on current weekly charge of £3.78</p> <p>New service users are currently offered a financial assessment when applying for telecare. Service users will have the opportunity to request a further financial assessment if they advise they are unable to pay following the introduction of the digital telecare charge.</p> <p>Financial assessments will be assessed against the non-residential charging policy which, following completion of their own Non Residential Charging Policy EQIA, is being adapted to reflect disability</p>
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				<p>related expenditure.</p> <p>Data on any users who stop the service following the implementation of the increased charge will be captured to identify any characteristic trends that indicate an unanticipated pattern.</p>
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
3.	<p>How have you applied learning from research evidence about the experience of equality groups to the service or Policy?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input checked="" type="checkbox"/></p>	<p>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).</p>	<p>The EQIA completed in March 2023 for the Non-Residential Charging Policy was reviewed in preparation for the completion of this EQIA.</p> <p>Cognisance was taken of key findings that those with disabilities, woman and minority ethnic groups were most likely to be living in poverty in Glasgow, and that those with disabilities face a higher cost of living</p> <p>Both policies are focused on a similar client group therefore learning from the non-residential charging policy EQIA has been incorporated in this EQIA</p>	<p>Those with disabilities, woman and minority ethnic groups are more likely to be living in poverty in Glasgow which may impact on their ability to pay an increased telecare charge</p> <p>Steps have been taken to mitigate against the cost to the service user. The connection is estimated to be £11 per month/week, this will be reduced to £7.50 for the service user. However, it is noted that this is still an increase on current weekly charge of £3.78</p> <p>Service users will have the opportunity to request a further financial assessment if they advise they are unable to pay following the introduction of the digital telecare charge.</p> <p>Financial assessments will be</p>

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	4) Not applicable			<p>assessed against the non-residential charging policy which is being adapted to reflect disability related expenditure.</p> <p>Data on any users who stop the service following the implementation of the increased charge will be captured to identify any characteristic trends that indicate an unanticipated pattern.</p>
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
4.	<p>Can you give details of how you have engaged with equality groups with regard to the service review or policy development? What did this engagement tell you about user experience and how was this information used? The Patient Experience and Public Involvement team (PEPI) support NHSGGC to listen and understand what matters to people and can offer support.</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant</p>	<p>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.</p> <p>(Due regard to promoting equality of opportunity)</p>	<p>A survey on the non-residential charging policy was carried in January 2023 where 5600 service users were invited to provide feedback on the charging policy along with third sector organisations. There were 118 responses, which included responses from telecare service users. Although the number of respondents was lower than anticipated, there was a good range of protected groups and feedback. People with disabilities felt that the charging policy was unfair due to their higher cost of living.</p>	<p>A change to the financial assessment in respect of disability related expenditure has been proposed to assist in addressing these concerns.</p>

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	<p>boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>* The Child Poverty (Scotland) Act 2017 requires organisations to take actions to reduce poverty for children in households at risk of low incomes.</p>		
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
5.	<p>Is your service physically accessible to everyone? If this is a policy that impacts on movement of service users through areas are there potential barriers that need to be addressed?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p>	<p>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).</p>	<p>The only limitation to accessing the service is having a Glasgow City postcode. Access to the service is available through a self-referral form or via a referral from a professional. The referral form requests information around any communication barriers the individual may face, including language, allowing communication to be tailored to the needs of the service user.</p> <p>Telecare enables care services to be provided in a meaningful way that is respectful of an individual's diversity and culture. The language settings on telecare equipment can be adjusted for service users where English is not their first language, and calls can be routed through to family members, if this is the service user's preference, reducing communication barriers.</p> <p>Provision of a digital service will be completed on a like for like basis. Service users should see little change to their current service provision.</p>	<p>When replacing equipment in service users homes this will be carried out in a way that is sensitive to service users vulnerabilities, language and beliefs.</p> <p>The tender for provision of an installation service includes specific requirements about visiting vulnerable people and consideration of service users culture and beliefs.</p> <p>"When carrying out installations technicians must be sensitive to the age and vulnerabilities of the service user group. The supplier must provide a copy of their protocol for working with vulnerable people and</p>

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	<p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>			consideration of service users culture and beliefs"
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
6.	<p>How will the service change or policy development ensure it does not discriminate in the way it communicates with service users and staff?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input checked="" type="checkbox"/></p>	<p>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.</p> <p>Written materials were offered in other languages and formats.</p> <p>(Due regard to remove discrimination, harassment and victimisation and promote equality of opportunity).</p>	<p>A full communication strategy for the analogue to digital programme is being developed. Communication will cover:</p> <ol style="list-style-type: none"> 1. Supporting service users through the installation process 2. Change to the service charge <p>The strategy will consider how we communicate with service users with varying needs and requirements, e.g. information being available in different languages/large text.</p> <p>The HSCP's communication department is supporting the development of this communication strategy.</p>	<p>Inability to communicate with service users about required changes could impact the ability to deliver programme outcomes by the analogue switch off date (2025)</p> <p>A cohesive communication strategy will be developed</p> <p>The tender for the provision of an equipment installation service includes requirements related to contacting vulnerable service users.</p> <p>"Methods used to contact service users and schedule appointments must be appropriate for the unique circumstances and needs of vulnerable service users"</p> <p>A DPIA is currently being developed. This EQIA will be updated following its completion.</p>

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	<p>4) Not applicable <input type="checkbox"/></p> <p>The British Sign Language (Scotland) Act 2017 aims to raise awareness of British Sign Language and improve access to services for those using the language. Specific attention should be paid in your evidence to show how the service review or policy has taken note of this.</p>		
7	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(a)	<p>Age</p> <p>Could the service design or policy content have a disproportionate impact on people due to differences in age? (Consider any age cut-offs that exist in the service design or policy content. You will need to objectively justify in the evidence section any segregation on the grounds of age promoted by the policy or included in the service design).</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p>	<p>The telecare service is available to individuals of all ages. Service users age currently ranges from 2 to 100+ years of age.</p> <p>The service is however predominantly used by older people. 84% are over 65 and nearly half are aged over 82. The Scottish Government has reported that 150,000 pensioners are living in persistent poverty in Scotland.</p>	<p>Vulnerabilities due to the age of the group may make the replacement of equipment more complex.</p> <p>The development of an installation and communication plan will consider and respect the vulnerabilities of this service user group. The HSCP's communications team are supporting this work.</p> <p>An increase in the telecare service charge may impact on service users' ability to pay.</p>

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	<p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>		<p>Steps have been taken to mitigate against the cost to the service user. The connection is estimated to be £11 per month/week, this will be reduced to £7.50 for the service user. However, it is noted that this is still an increase on current weekly charge of £3.78</p> <p>New service users are currently offered a financial assessment when applying for telecare. Service users will have the opportunity to request a further financial assessment if they advise they are unable to pay following the introduction of the digital telecare charge.</p> <p>Financial assessments will be assessed against the non-residential charging policy which is being adapted to reflect disability related expenditure.</p> <p>Data on any users who stop the service following the implementation of the increased charge will be captured to identify any characteristic trends that indicate an unanticipated pattern.</p> <p>A cohesive communication strategy will be developed. The strategy will consider how we communicate with service users with varying needs and requirements, e.g. information being</p>
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			available in different languages/large text.
(b)	<p>Disability</p> <p>Could the service design or policy content have a disproportionate impact on people due to the protected characteristic of disability?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>There is an expectation that a high proportion of service users have a disability. 28% of telecare service users (where a main client group is recorded) have disabilities listed as a main client group. It is however recognised that individuals may have multiple vulnerabilities, not necessarily reflected in their main client group. The number is therefore expected to be higher.</p> <p>In the non-residential charging policy survey, carried out in January 2023, people with disabilities fed back that the charging policy was unfair due to their higher cost of living.</p> <p>It is recognised that individuals with a disability may be in receipt of more than one service and therefore accumulate multiple service charges</p> <p>A full communication strategy for the analogue to digital programme is being developed. Communication will cover:</p> <ol style="list-style-type: none"> 1. Supporting service users through the installation process 2. Change to the service charge <p>The strategy will consider how we communicate with service users with varying needs and requirements, e.g. information being available in different languages/large text.</p>	<p>Vulnerabilities related to service users disabilities may make the replacement of equipment more complex, for example if they are unable to hear or answer the door themselves.</p> <p>The development of an installation and communication plan will consider and respect the vulnerabilities of this service user group. The HSCP's communications team are supporting this work.</p> <p>An increase in the telecare service charge may impact on service users' ability to pay</p> <p>Steps have been taken to mitigate against the cost to the service user. The connection is estimated to be £11 per month/week, this will be reduced to £7.50 for the service user. However, it is noted that this is still an increase on current weekly charge of £3.78</p> <p>New service users are currently offered a financial assessment when applying for telecare. Service users will have the opportunity to request a further financial assessment if they advise they are unable to pay</p>

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			<p>following the introduction of the digital telecare charge.</p> <p>Financial assessments will be assessed against the non-residential charging policy which is being adapted to reflect disability related expenditure.</p> <p>Data on any users who stop the service following the implementation of the increased charge will be captured to identify any characteristic trends that indicate an unanticipated pattern.</p> <p>A cohesive communication strategy will be developed. The strategy will consider how we communicate with service users with varying needs and requirements, e.g. information being available in different languages/large text.</p>
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(c)	<p>Gender Reassignment</p> <p>Could the service change or policy have a disproportionate impact on people with the protected characteristic of Gender Reassignment?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p>	<p>No data is currently held for current service users on gender reassignment. It is not anticipated that there will be an impact for people with this protected characteristic</p>	<p>No negative impact envisaged</p>

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	<p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(d)	<p>Marriage and Civil Partnership</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Marriage and Civil Partnership?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>20% of service users with a recorded marital status have the characteristic of married or in a civil partnership</p>	<p>It is not anticipated that there will be a negative impact for people with this protected characteristic. Telecare services are charged per household as opposed to service user.</p> <p>Marriage and civil partnership status are considered within the non-residential charging policy</p> <p>A cohesive communication strategy will be developed. The strategy will consider how we communicate with service users with varying needs and requirements, e.g. information being available in different languages/large text.</p>

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(e)	<p>Pregnancy and Maternity</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Pregnancy and Maternity?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>It is understood that individuals who are pregnant or on maternity leave may be impacted by higher costs of living.</p> <p>Over 84% of service users are older people, therefore it is not envisaged that this policy will have a disproportionate impact on this group</p>	<p>It is not anticipated that there will be a negative impact for people with this protected characteristic however their ability to pay will be assessed against the non-residential charging policy</p>
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(f)	<p>Race</p> <p>Could the service change or policy have a disproportionate impact on people with the protected characteristics of Race?</p> <p>Your evidence should show which of the 3 parts of the</p>	<p>Minority ethnic communities are more likely to live in poverty. 92% of service users are White Scottish/Irish/British/other background. The percentage of service users accessing telecare from minority ethnic communities is small.</p> <p>:</p>	<p>An increase in the telecare service charge may impact on service users' ability to pay.</p> <p>Steps have been taken to mitigate against the cost to the service user. The connection is estimated to be</p>

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	<p>General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>		<p>£11 per month/week, this will be reduced to £7.50 for the service user. However, it is noted that this is still an increase on current weekly charge of £3.78</p> <p>New service users are currently offered a financial assessment when applying for telecare. Service users will have the opportunity to request a further financial assessment if they advise they are unable to pay following the introduction of the digital telecare charge.</p> <p>Ability to pay will be assessed against the non-residential charging policy.</p> <p>Data on any users who stop the service following the implementation of the increased charge will be captured to identify any characteristic trends that indicate an unanticipated pattern.</p> <p>A cohesive communication strategy will be developed. The strategy will consider how we communicate with service users with varying needs and requirements, e.g. information being available in different languages/large text.</p>
(g)	Religion and Belief	A small proportion of telecare service users (98) belong to religious minorities	The tender for the provision of an equipment installation service

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	<p>Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Religion and Belief?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>It will be important that during installation of new equipment technicians are considerate of the beliefs and customers of service users who belong to religious groups.</p>	<p>includes requirements related to visiting vulnerable and ethnic groups</p> <p>“When carrying out installations technicians must be sensitive to the age and vulnerabilities of the service user group. The supplier must provide a copy of their protocol for working with vulnerable and ethnic groups”</p> <p>Data on any users who stop the service following the implementation of the increased charge will be captured to identify any characteristic trends that indicate an unanticipated pattern.</p> <p>A cohesive communication strategy will be developed. The strategy will consider how we communicate with service users with varying needs and requirements, e.g. information being available in different languages/large text.</p>
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(h)	<p>Sex</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sex?</p>	<p>Two thirds of service users are female. Woman are more likely to live in poverty and more likely to be impacted by the cost of living.</p>	<p>An increase in the telecare service charge may impact on service users' ability to pay</p> <p>Steps have been taken to mitigate</p>

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	<p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input checked="" type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>		<p>against the cost to the service user. The connection is estimated to be £11 per month/week, this will be reduced to £7.50 for the service user. However, it is noted that this is still an increase on current weekly charge of £3.78</p> <p>New service users are currently offered a financial assessment when applying for telecare. Service users will have the opportunity to request a further financial assessment if they advise they are unable to pay following the introduction of the digital telecare charge.</p> <p>Financial assessments will be assessed against the non-residential charging policy.</p> <p>Data on any users who stop the service following the implementation of the increased charge will be captured to identify any characteristic trends that indicate an unanticipated pattern.</p> <p>A cohesive communication strategy will be developed. The strategy will consider how we communicate with service users with varying needs and requirements, e.g. information being available in different languages/large text.</p>
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(i)	<p>Sexual Orientation</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sexual Orientation?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input checked="" type="checkbox"/></p>	No service user data is collected on sexual orientation.	It is not anticipated that there will be a negative impact for people with this protected characteristic
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(j)	<p>Socio – Economic Status & Social Class</p> <p>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?</p> <p>The Fairer Scotland Duty (2018) places a duty on public bodies in Scotland to actively consider how they can reduce inequalities of outcome caused by socioeconomic disadvantage when making <u>strategic</u> decisions. If relevant, you should evidence here what steps have been taken to assess and mitigate risk of</p>	<p>Telecare service users are more likely to live in deprived areas than the general population.</p> <p>65% of service users' properties are located in the 3 most deprived areas in Glasgow (SIMD) compared with 41% of the population in Glasgow as a whole.</p>	<p>An increase in the telecare service charge may impact on service users' ability to pay. This may impact those individuals already experiencing poverty more heavily.</p> <p>When applying for a telecare service individual are offered a financial assessment ensuring income maximisation.</p> <p>Steps have been taken to mitigate</p>

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<p>exacerbating inequality on the ground of socio-economic status. Additional information available here: Fairer Scotland Duty: guidance for public bodies - gov.scot (www.gov.scot)</p> <p>Seven useful questions to consider when seeking to demonstrate ‘due regard’ in relation to the Duty:</p> <ol style="list-style-type: none"> 1. What evidence has been considered in preparing for the decision, and are there any gaps in the evidence? 2. What are the voices of people and communities telling us, and how has this been determined (particularly those with lived experience of socio-economic disadvantage)? 3. What does the evidence suggest about the actual or likely impacts of different options or measures on inequalities of outcome that are associated with socio-economic disadvantage? 4. Are some communities of interest or communities of place more affected by disadvantage in this case than others? 5. What does our Duty assessment tell us about socio-economic disadvantage experienced disproportionately according to sex, race, disability and other protected characteristics that we may need to factor into our decisions? 6. How has the evidence been weighed up in reaching our final decision? 7. What plans are in place to monitor or evaluate the impact of the proposals on inequalities of outcome that are associated with socio-economic disadvantage? ‘Making Fair Financial Decisions’ (EHRC, 2019)²¹ provides useful information about the ‘Brown Principles’ which can be used to determine whether due regard has been given. When 		<p>against the cost to the service user. The connection is estimated to be £11 per month/week, this will be reduced to £7.50 for the service user. However, it is noted that this is still an increase on current weekly charge of £3.78</p> <p>The opportunity to have a further financial assessment completed will be offered to service users who advise they are unable to pay the increased charge.</p> <p>Financial assessments will be assessed against the non-residential charging policy.</p> <p>Financial assessments take account of the cost of the range of services each client receives compared to disposable income, ensuring individuals do not pay more than they can afford.</p> <p>Data on any users who stop the service following the implementation of the increased charge will be captured to identify any characteristic trends that indicate an unanticipated pattern.</p> <p>A cohesive communication strategy will be developed. The strategy will consider how we communicate with service users with varying needs and</p>
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	engaging with communities the National Standards for Community Engagement ²² should be followed. Those engaged with should also be advised subsequently on how their contributions were factored into the final decision.		requirements, e.g. information being available in different languages/large text.
(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?	Currently telecare can only be installed in a service users' property, meaning it hasn't been widely used where service users have no fixed abode. New digital equipment is easier to install, requiring no hard wiring or access to an analogue phone line, offering new opportunities for future service provision.	New opportunities for service provision will be explored as part of the Digital Smart Cities agenda
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 (tick relevant boxes). 1) Remove discrimination, harassment and victimisation <input type="checkbox"/> 2) Promote equality of opportunity <input type="checkbox"/> 3) Foster good relations between protected characteristics. <input type="checkbox"/> 4) Not applicable <input checked="" type="checkbox"/>	<p>No. The transfer of telecare to a digital service will substantially increase its operating costs. Financial modelling has determined that the ongoing service costs will increase to approx. £11 per connection.</p> <p>The proposed digital telecare charge of £7.50, whilst a substantial increase, will be subsidised and will still represent best value for the service user.</p>	<p>An increase in the telecare service charge may impact on service users' ability to pay. This may impact those individuals already facing poverty more heavily.</p> <p>Steps have been taken to mitigate against the cost to the service user. The connection is estimated to be £11 per month/week, this will be reduced to £7.50 for the service user. However, it is noted that this is still an increase on current weekly charge of £3.78</p> <p>When apply for a telecare service individual are offered a financial assessment ensuring income maximisation</p>

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			<p>The opportunity to have a further financial assessment completed will be offered to service users who advise they are unable to pay the increased charge.</p> <p>Financial assessments will be assessed against the non-residential charging policy</p> <p>Data on any users who stop the service following the implementation of the increased charge will be captured to identify any characteristic trends that indicate an unanticipated pattern.</p>
		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.	Staff complete annual Gold equality training. This is made accessible offline for staff who struggle / can not access the internet. New staff coming into the service receive comprehensive training packages and staff are encouraged to access materials and attend courses to expand their knowledge.	<p>Training levels are reviewed regularly by senior management.</p> <p>The HSCP will be contracting with an external company for the provision of an equipment installation service for digital telecare. The successful company will have to evidence that they have established protocols for working with vulnerable and ethnic groups.</p>

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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 risks were identified which would likely impact of the human rights of service users. This service is provided in accordance with the principals of the Health and Social Care Standards.

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* .

Telecare has been designed with an equality-based approach that is considerate of human rights. As there are changes to laws with respect to protected characteristics, legislation or additional fundamental change to human rights, the service adapts policies and plans with all of this in mind. Telecare was developed to be accessible and available to everyone. This approach ensures a fair approach that does not discriminate against: Age, Sex, Gender Status, Marital Status, Religion, Ethnicity / Race, Refugee Status, Gypsies and Travellers and Disabilities; furthermore, the service does not discriminate against socio-economic factors, political persuasions and / or

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languages spoken.

*

- **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.

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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)
1. Development of an installation and communication plan which considers the vulnerabilities of the service user group.	April 2024	ND
2. Offer financial assessments to service users who advise they are unable to pay following the introduction of the digital telecare charge.	Dec 2024	ND
3. Request and review Care First report on protected characteristics of service users on a regular basis to assist in planning future service delivery	Jan 2025	AM

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

04/06/24

Lead Reviewer:

Nicola Dolan

EQIA Sign Off:

Project Manager

Nicola Dolan

04/12/2023

Quality Assurance Sign Off:

Name

Alastair Low

Job Title

Planning Manager

Signature

Alastair Low

Date

06/12/2023

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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:

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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

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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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