

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:

Test of Change Programme – Adult Social Care Assessments within HMP Greenock and HMP Low Moss

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

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

What does the service or policy do/aim to achieve? Please give as much information as you can, remembering that this document will be published in the public domain and should promote transparency.

The programme aims to test the introduction of an integrated model of adult social care assessment within the prison setting
identify people at the beginning of their prison journey, throughout their stay, and supporting their future needs as they leave
to include disability, addictions, and mental health needs
develop a holistic assessment process in partnership with health colleagues

2. To test the National Health and Wellbeing Outcomes in the prison setting and how these can be implemented and evaluated to determine what difference the test of change has made to the people's lives.

3. To test an integrated management approach within the prison.

Specific social work assessment and care management and occupational therapy staff will be employed across both prisons for a 6 month period, to work in an integrated way with healthcare staff to develop a personalised outcome based assessment approach. This will include responses to the needs of prisoners who have addictions issues, mental health issues, disability and those with multiple/complex needs. Holistic care pathways and social care responses will be developed to ensure a more seamless provision of services to prisoners in the move from community to prison and back to community

Why was this service or policy selected for EQIA? Where does it link to organisational priorities? (If no link, please provide evidence of proportionality, relevance, potential legal risk etc.)

The test of change work represents an enhancement to existing levels of social care assessments in prisons and could offer prisoners significant benefit by shaping services (and service referrals) towards previously unmet need. There is an opportunity at the test of change stage to ensure the agreed final mainstream model can demonstrate sensitivity and inclusion of all relevant protected characteristics. This is particularly relevant given the patterning of the prison population by age, disability, sex and socio-economic status.

Social care should be viewed as an Equality duty that firstly enables disabled prisoners to be on a commensurate footing with other prisoners, and secondly as a mechanism for meeting quality of life and development goals of disabled prisoners

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: Rhoda Macleod	Date of Lead Reviewer Training:
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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):

Rhoda Macleod, Fiona Noble, Doris Williamson, Liz Hay Test of Change Steering group were invited to comment
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	<i>Example</i>	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required	
1.	<p>What equalities information is routinely collected from people currently using the service or affected by the policy? If this is a new service proposal what data do you have on proposed service user groups. Please note any barriers to collecting this data in your submitted evidence and an explanation for any protected characteristic data omitted.</p>	<p><i>A sexual health service collects service user data covering all 9 protected characteristics to enable them to monitor patterns of use.</i></p>	<p>Current Scottish Prison Service data capture extends to 8 protected characteristics: Age Disability Gender Reassignment Marriage and Civil Partnership Pregnancy and Maternity Race Religion and Belief Sex All PHC data would be made available with prisoner agreement where required as part of the test of change programme.</p>	
	<i>Example</i>	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required	
2.	Please provide	A physical	Data will be used across the course of the	

	<p>details of how data captured has been/will be used to inform policy content or service design. Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>activity programme for people with long term conditions reviewed service user data and found very low uptake by BME (Black and Minority Ethnic) people. Engagement activity found promotional material for the interventions was not representative. As a result an adapted range of materials were introduced with ongoing monitoring of uptake. (Due regard promoting equality of opportunity)</p>	<p>test of change programme to assess uptake by protected characteristic group and analyse any resulting patterns. This will also inform engagement activity planning to facilitate feedback from service users.</p>	
	<p><i>Example</i></p>	<p>Service Evidence Provided</p>	<p>Possible negative impact and Additional Mitigating Action Required</p>	

<p>3.</p>	<p>How have you applied learning from research evidence about the experience of equality groups to the service or Policy?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p><i>Looked after and accommodated care services reviewed a range of research evidence to help promote a more inclusive care environment. Research suggested that young LGBT+ people had a disproportionately difficult time through exposure to bullying and harassment. As a result staff were trained in LGBT+ issues and were more confident in asking related questions to young people. (Due regard to removing discrimination, harassment and victimisation and</i></p>	<p>In April 2018 Social Work Scotland commissioned the University of Dundee and in September 2018 they published ‘A New Vision for Social Care in Prisons’. The report provides a foundation for policy and practice decisions around the delivery of health and social care in Scottish prisons, based on academic research. In response to the recommendations contained in the report, the Scottish Government’s Health and Social Care Integration in Prisons Workstream produced a response which included the agreement to work collaboratively with the Scottish Prison Service, NHS, adult social services and wider partners, to develop ‘Tests of Change’ sites to create new ways of delivering integrated health and social care within the prison environment.</p> <p>Population estimates for the number of Scottish prisoners with social care needs, narrowly defined as personal care, are 1.85% (n = 170) of the total prison population, 0.84% of the under 50s, and 8.66% of the over 50s (Scottish Prison Service, 2018).</p> <p>Given the levels of health inequality and deprivation experienced by many people</p>	
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		<i>fostering good relations).</i>	in prison, these figures may be a conservative estimate.	
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
4.	<p>Can you give details of how you have engaged with equality groups with regard to the service review or policy development? What did this engagement tell you about user experience and how was this information used?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered</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</p>	<p>‘A new vision for social care in prisons’ included semi-structured and explorative interviews with prisoners across 3 prisons in Scotland. All participants were male and white, and all had recognised social care needs. An emerging theme from the interviews was the psycho-social impact of prisoners’ disability experiences and the sense that they do not have equitable freedom of movement, are confined to their cells and/or restricted to using certain (accessible) areas of the prison estate – all of which magnifies their imprisonment experience. A clear message from the study is that social care in prisons lacks prioritisation and imagination, and runs the risk of being seen as a discreet add-on to existing arrangements where possible, rather than a mainstream and routinely</p>	

	<p>(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>X</p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>home visit and telephone service which significantly increased uptake.</p> <p>(Due regard to promoting equality of opportunity)</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>	<p>addressed issue.</p> <p>Throughout the test of change programme engagement activities will be undertaken with users that will capture PC information and contextualise this for reporting and re-development.</p>	
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
5.	Is your service physically accessible to everyone? If this is	An access audit of an outpatient physiotherapy department	Assessments will take place as close to where the recipients are based as possible – either in the health suite or alternative accessible environment. The	

<p>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 X</p> <p>2) Promote equality of opportunity X</p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>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>assessments may include review of physical environment (although this is not the primary role of the ToC) and so recommend enhancement in order to improve accessibility.</p>	
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		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). 1) Remove discrimination, harassment and victimisation <input 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</p>	<p>All service user materials associated with the test of change programme will be available in other formats and languages and will take into account barriers to access created by literacy issues. Social work and NHS staff will adhere to their respective clear communication policies in all aspects of service delivery including provision of spoken language and BSL interpreters.</p> <p>Anyone can self refer via readily-available forms (located where prisoner's communications are usually located) for an initial assessment to determine their eligibility and to receive their consent. This is equitable with community provision.</p>	

<p>2) Promote equality of opportunity <input checked="" type="checkbox"/> X</p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <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>	<p>discrimination, harassment and victimisation and promote equality of opportunity).</p>		
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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 type="checkbox"/></p> <p>2) Promote equality of opportunity X</p> <p>3) Foster good relations between protected characteristics.</p> <p>4) Not applicable <input type="checkbox"/></p>	<p>Service would be dependent on biological assessment rather than chronological assessment. Access will be based on need of the individual.</p>	

(b)	<p>Disability</p> <p>Could the service design or policy content have a disproportionate impact on people due to the protected characteristic of disability?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity X</p> <p>3) Foster good relations between protected characteristics.</p> <p>4) Not applicable <input type="checkbox"/></p>	<p>No disproportionate impact – assessment would facilitate enhancement to current provision rather than remove it.</p> <p>Reasonable adjustments will be put in place to ensure that prisoners can participate, including BSL interpreting, other language formats, interpreters, etc.</p>	
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(c)	<p>Gender Identity</p> <p>Could the service change or policy have a disproportionate impact on</p>	<p>No immediate impact anticipated, though any association that may be important to consider as part of the assessment could be discussed at the point of engagement.</p>	

	<p>people with the protected characteristic of gender identity?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/> X</p> <p>3) Foster good relations between protected characteristics <input 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</p>	<p>No immediate impact anticipated, though any association that may be important to consider as part of the assessment could be discussed at the point of engagement.</p>	

	<p>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 X</p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>		
(e)	<p>Pregnancy and Maternity</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Pregnancy and Maternity?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity X</p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p>	<p>No immediate impact anticipated, though any association that may be important to consider as part of the assessment could be discussed at the point of engagement.</p>	

	4) Not applicable <input type="checkbox"/>		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(f)	<p>Race</p> <p>Could the service change or policy have a disproportionate impact on people with the protected characteristics of Race?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity X</p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>Any assessments would be inclusive of language support in the form of either telephone or face to face interpreter and translated materials in either audio or written format,</p>	
(g)	Religion and Belief	No immediate impact anticipated, though any association that may be important to	

	<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 type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>consider as part of the assessment could be discussed at the point of engagement.</p>	
	<p>Protected Characteristic</p>	<p>Service Evidence Provided</p>	<p>Possible negative impact and Additional Mitigating Action Required</p>
<p>(h)</p>	<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>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant</p>	<p>Given the prison populations being predominantly men (Low Moss exclusively men) and patterning of custodial sentences by sex, far more men than women would be expected to participate in the test of change programme. However, sex (gender) differences will be considered as part of the programme and will help inform the final mainstreaming proposal.</p>	

	<p>boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity X</p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>The assessment tools used in the Test of Change are the same as those used in community settings, therefore there is parity with regards to gender issues. The ToC does not look to address issues leading to incarceration rather it supports those moving back to community and links with third sector supports (eg for GBV) and joint working with HSCP locally are part of the ToC.</p>	
(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 X</p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>No immediate impact anticipated, though any association that may be important to consider as part of the assessment could be discussed at the point of engagement.</p>	

	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 the people because of their social class or experience of poverty and what mitigating action have you taken/planned?</p> <p>The Fairer Scotland Duty (2018) places a duty on public bodies in Scotland to actively consider how they can reduce inequalities of outcome caused by socioeconomic disadvantage in strategic planning. You should evidence here steps taken to assess and mitigate risk of exacerbating inequality on the ground of socio-economic status.</p>	<p>Provision of social care assessment should help to ease the burden of poverty during and after terms in prison, with assessment reports supporting the individual as part of liberation planning.</p>	
(k)	<p>Other marginalised groups</p> <p>How have you considered the</p>	<p>Most groups covered and will be offered enhancement.</p>	

	<p>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?</p>		
<p>8.</p>	<p>Does the service change or policy development include an element of cost savings? How have you managed this in a way that will not disproportionately impact on protected characteristic groups?</p> <p>Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input checked="" type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>4) Not applicable <input type="checkbox"/></p>	<p>Funded test of change – Scot govt has provided funding for the 6 month Test, however there is no funding agreed internally or externally to continue this beyond the 6 month period.</p>	
		<p>Service Evidence Provided</p>	<p>Possible negative impact and Additional Mitigating Action Required</p>

9.	<p>What investment in learning has been made to prevent discrimination, promote equality of opportunity and foster good relations between protected characteristic groups? As a minimum include recorded completion rates of statutory and mandatory learning programmes (or local equivalent) covering equality, diversity and human rights.</p>	<p>All prison healthcare staff complete the LearnPro module (NHS). SPS undertake their own equality and diversity module. Requirement for everyone to complete stat mand modules.</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.

<p>Enhancement – caveat with the prison environment but rights will be upheld and supported Any concerns</p>
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regarding an individual's human rights are raised and dealt with through the systems and processes in place with SPS.

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* .

Facts: What is the experience of the individuals involved and what are the important facts to understand?

Analyse rights: Develop an analysis of the human rights at stake

Identify responsibilities: Identify what needs to be done and who is responsible for doing it

Review actions: Make recommendations for action and later recall and evaluate what has happened as a result.

Having completed the EQIA template, please tick which option you (Lead Reviewer) perceive best reflects the findings of the assessment. This can be cross-checked via the Quality Assurance process:

- Option 1: No major change (where no impact or potential for improvement is found, no action is required)
- Option 2: Adjust (where a potential or actual negative impact or potential for a more positive impact is found, make changes to mitigate risks or make improvements)
- Option 3: Continue (where a potential or actual negative impact or potential for a more positive impact is found but a decision not to make a change can be objectively justified, continue without making changes)
- Option 4: Stop and remove (where a serious risk of negative impact is found, the plans, policies etc. being assessed should be halted until these issues can be addressed)

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

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?(in initials)

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

**Lead Reviewer:
EQIA Sign Off:**

**Name
Job Title
Signature
Date**

Quality Assurance Sign

**Off:Name
Job Title
Signature
Date**

**NHS GREATER GLASGOW AND CLYDE EQUALITY IMPACT ASSESSMENT TOOL
MEETING THE NEEDS OF DIVERSE COMMUNITIES
6 MONTHLY REVIEW SHEET**

Name of Policy/Current Service/Service Development/Service Redesign:

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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:			

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:

Please email a copy of this EQIA review sheet to [CIT](#) or send to Corporate Inequalities Team, NHS Greater Glasgow and Clyde, JB Russell House, Gartnavel Royal Hospitals Site, 1055 Great Western Road, G12 0XH. Tel: 0141-201-4817.