

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:
NHS Greater Glasgow & Clyde – Safer Drug Consumption Facility
Is this a: Current Service Service Development Service Redesign New Service New Policy 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.
This service aims to provide a clean supervised environment where people who use drugs may prepare and inject their chosen drugs using clean
equipment. Staff will be in a position to provide medical support where drug overdose may arise, and will be in a position to highlight and link service
users to other treatment and / or social care services, and third sector organisations for support.
The outcomes for service users will include to reduce overdose, transmission of Blood Borne Viruses (BBV's) and link service users to other agencies.
The outcomes for the wider population includes to reduce the level of public injecting with Glasgow city centre, the nuisance caused by such activity
including litter and discarded injecting equipment.
Control of the Contro
NHS GG&C offer a wide range of addiction and recovery services across the entire health board area.
Following a localised HIV outbreak in Glasgow city centre in 2015, a health needs assessment was undertaken, and the creation of a Safer Drug
Consumption Facility was amongst the recommendations in the subsequent report – "Taking Away the Chaos"
(https://www.nhsggc.org.uk/media/238302/nhsggc_health_needs_drug_injectors_full.pdf_).
The Safer Drug Consumption Facility will be delivered by a specialist multidisciplinary team, supported by links to a variety of Health and Social Care
services. It adds a new level of support in addition to the existing services, which targets the city centre public injecting population.
Pathways:
Research has demonstrated that SDCF users experience increased engagement with detoxification and drug dependence treatment services, enhanced

access to broader health supports, and a positive impact on their treatment. The facilities not only provide a safe environment for drug consumption but also play a vital role in connecting users with various health and social services. The use of SDCFs is associated with higher rates of uptake for detoxification and opioid substitution treatment. SDCFs were also linked to increased access to other health and support services, and in Sydney it was found that clients' engagement with treatment services increased significantly compared with their initial visit to the SDCF.

Drug consumption rooms: an overview of provision and evidence | www.emcdda.europa.eu

Belackova V, Silins E, Salmon AM, Jauncey M, Day CA. "Beyond safer injecting" - Health and social needs and acceptance of support among clients of a supervised injecting facility. J Environ Res. 2019;16(11):2032. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6603933/

This service will engage with and support service users to access:

- Existing GADRS treatment services
- EDTS
- Existing health services e.g. BBV nurses, sexual health team, wound care, primary care services etc.
- Housing
- Benefits
- 3rd sector organisations
- Peer recovery groups

There are 4 interview rooms and 2 treatment rooms' onsite to facilitate service user interaction with onsite representatives from these groups.

This aims to develop existing services to meet the needs of this multiple disadvantaged population, reduce the risk of drug-related deaths and poor health outcomes.

A large body of international evidence, from well-established Safer Drug Consumption Services / Drug Consumption Rooms from around the world, demonstrates the benefits of these services to both the individuals using those services, and the wider community. (http://www.emcdda.europa.eu/publications/insights/heroin-assisted-treatment en)

There is a wealth of research available to support the introduction of this service. The Scottish Government produced the paper *Safer Drug Consumption Facilities:* evidence paper 2021(Safer drug consumption facilities: evidence paper - gov.scot (www.gov.scot)) which specifically highlights the case for such a service to be located within Glasgow.

What is the eligibility criteria for accessing the service?

Eligibility Criteria:

SDCFs aim to be low threshold services, with as few barriers as possible to engage with the target population, the majority of whom tend not to engage

with existing treatment or support services (REF).

There will be minimal restrictions regarding access to the SDCF and its services. SU's will:

- Age 18 years and over this does provide an opportunity for staff to encourage those under 18 years to link in with the young person's service
- Already be drug dependent
- Not pregnant this provides an opportunity for staff to encourage pregnant SU's to engage with appropriate services
- Show no signs of intoxication

Why was this service or policy selected for EQIA? Where does it link to organisational priorities? (If no link, please provide evidence of proportionality, relevance, potential legal risk etc.). Consider any locally identified Specific Outcomes noted in your Equality Outcomes Report.

This is an update to the first EQIA for the Safer Drug Consumption Facility. As part of service development it was agreed that it would be beneficial for the service to reflect on its reach, performance and consider areas for improvement to aim to reduce the impact of consumption of drugs in public spaces within Glasgow city centre, both on the individual using the drugs and the general population affected by such drug use.

This service reflects some of the key priorities for Scottish Government:

National Drugs Mission Plan: 2022 – 2026 (National Drugs Mission Plan: 2022-2026 - gov.scot (www.gov.scot))

Rights, Respect and Recovery (2018) (Rights, respect and recovery: alcohol and drug treatment strategy - gov.scot (www.gov.scot))

Scottish Drugs Death Taskforce Recommendations – Changing Lives 2022 Changing lives: our final report. - Drugs and Alcohol

Note:

This EQIA is being published at the start of the implementation stage for this project. This will be updated and re-published to reflect comments and observations gathered during the engagement phase.

Who is the lead reviewer and when did they attend Lead reviewer Training? (Please note the lead reviewer must be someone in a position to authorise any actions identified as a result of the EQIA)

Name:	Date of Lead Reviewer Training:
Saket Priyadarshi, Associate Medical Director, Addictions,	
Saket.Priyadarshi@ggc.scot.nhs.uk	
Stuart R Notman, Programme Manager, Complex Needs	27/04/2023
Stuart.Notman@ggc.scot.nhs.uk	

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):

Members of the Executive Alcohol Drug Partnership Safer Drug Consumption Room Short Life Working Group

		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
1.	What equalities information is routinely collected from people	A sexual health service collects service user data covering all 9	Routine data collection: Data will be collected using existing systems for the recording of interactions with this service user group.	
	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	protected characteristics to enable them to monitor patterns of use.	 There are two main categories of systems: The anonymised system (NEO) used for Injecting Equipment Supply, Naloxone supply, Assessment of Injecting Risk etc. Standard NHS treatment systems which require full name, address and CHI number entry / recording. 	
	an explanation for any protected characteristic data omitted.		Elements of this service are 'anonymous', and for those elements the details recorded are: • Gender – Male, Female or Trans • Client Reference number – 1 st letter of 1 st name, 1 st and 4 th letters of last name, date of birth e.g.	

MMS01/02/1923

- Ethnicity
- Housing status

Disability Information:

Additional information regarding disability will be captured, however the level of assistance staff will be able to offer will be restricted to ensure service users, staff, managers and the organisation do not commit an offence. For example a staff member may help push a wheelchair or provide written or verbal advice, they can light the heat source for the service user to then make their dose, however staff may not handle the drugs being prepared, or assist with injection or permit anyone else from assisting, doing so would breach numerous offences both for the individual, staff member, service management and the organisations.

Barriers may include willingness of service user to provide accurate data. Since this is an anonymous service, there is no opportunity to cross reference / check details provided are accurate.

Additional Data – if medical interventions are required:

Data is collected via EMIS and includes information on Service User age, gender, socioeconomic status, sexual orientation, religion and disability.

Access needs:

Staff and service users will have access to interpretation services as per HSCP / NHSGG&C Interpreting and Communication Support Policy.

Staff have access to British Sign Language services via interpreting services.

			Written materials are available	e in a variety of lan	iguages.	
		Example	Service Evidence Provided			Possible negative impact and Additional Mitigating Action Required
2.	Please provide details of	A physical activity	The data captured on Neo will		ata	
	how data captured has	programme for people	regarding service update by th			
	been/will be used to	with long term	This information will inform if			
	inform policy content or	conditions reviewed	general characteristics of the v	wider population o	of people	
	service design.	service user data and	who use drugs.			
	was a tila assala di	found very low uptake				
	Your evidence should	by BME (Black and	Scottish substance misuse dat	•	-	
	show which of the 3 parts	Minority Ethnic)	the demographics of the popu	lation of people w	ho inject	
	of the General Duty have	people. Engagement	drugs in Scotland is:	1		
	been considered (tick	activity found	Age	Percentage		
	relevant boxes).	promotional material	<25 years	14%		
	1) Remove discrimination,	for the interventions	25 – 34 years	33%		
	harassment and	was not	Over 35 years	53%		
	victimisation \square	representative. As a	Ratios			
		result an adapted range	Male:Female Ratio	2.7:1		
	2) Promote equality of	of materials were	Scottish Drug Misuse Database	e (isdscotland.org)		
	opportunity 🗹	introduced with				
		ongoing monitoring of	Demographics for the Glasgov	•	-	
	3) Foster good relations	uptake.	public injecting population, ob	tained from the "T	Γaking	
	between protected	(Due regard promoting	Away the Chaos" report are:			
	characteristics.	equality of opportunity)		T		
	4) Net emplicable		Age	Percentage		
	4) Not applicable		<20 years	0.3%		
			20 – 29 years	9.6%		
			30 – 39 years	42.9%		
			40 – 49 years	39.1%		
			Over 50 years	8.2%		
			Ratios			
			Male:Female Ratio	4.3:1		

https://www.nhsggc.org.uk/media/238302/nhsggc_healt h_needs_drug_injectors_full.pdf

In both cases the majority of people who inject drugs are older males. Some studies (see "Taking Away the Chaos" Report) have suggested that public injecting is higher in males than females and the Glasgow data would appear to be consisted with this.

The demographics reported upon in the "Taking Away the Chaos" report would also suggest that the majority of public injectors in Glasgow identify themselves as either Scottish or British.

In 'Drug Consumption Rooms in Europe - organisational overview' (Sara Woods 2014) 90.6% of Drug Consumption Rooms (DCR's) in Europe reported a minimum age requirement of 18 years.

The criteria for entry into the Glasgow SDCF is over 18 years. This is in line with the data obtained from other DCR's.

(PDF) Drug Consumption Rooms in Europe - organisational overview (researchgate.net)

In Glasgow, as with other addiction services, the minimum treatment age is usually 18 years, the Glasgow SDCF sits within Glasgow Alcohol and Drug Recovery Services

Patients must demonstrate capacity to provide consent. In the UK the Children Act 1989 s105 draws a line between childhood and adulthood on a person's 18th birthday. Whilst a 16 to 17 year old possess the right to consent to medical treatment, that right is not absolute and can be overturned by a parent.

Consent, obviously, is not purely determined by a

			The published results of a assessing self-reported drewith the primary sector ar service users of Danish drewthe following demographic Age <30 years	ig consumption rooms provides cs for DCR clients: 10%	
			30 to 39 years 40 to 49 years >50 years Ratio Male:Female Ratio	30% 36% 24% s	
				<u> </u>	
			_	service will be reviewed and who attend the service broadly raphic data for the target	
•	•	Example	Service Evidence Provided		Possible negative impact and Additional Mitigating Action Required
3.	How have you applied learning from research evidence about the	Looked after and accommodated care services reviewed a	The Glasgow City ADP has experience reference grouinvolved in providing feed	ps. These groups will be	-

experience of equality groups to the service or Policy? Your evidence should show which of the 3 parts of the General Duty have	range of research evidence to help promote a more inclusive care environment. Research suggested that young LGBT+ people had a	appropriate elements of the service design and operational delivery for example: • Layout and furnishings within the service • Pathways and interfaces to other services • Service user information leaflets The layout of the services and areas within the service for	
been considered (tick relevant boxes).	disproportionately difficult time through exposure to bullying	example the aftercare are, will be designed as trauma informed spaces.	
1) Remove discrimination, harassment and victimisation ✓	and harassment. As a result staff were trained in LGBT+ issues and	The service design and implementation group has based their service planning extensively on research and learning from other well established sites around the	
2) Promote equality of opportunity ✓	were more confident in asking related questions to young	world. <u>Drug consumption rooms: an overview of provision and evidence www.emcdda.europa.eu</u>	
3) Foster good relations between protected characteristics ✓	people. (Due regard to removing discrimination,	A review of structural, process, and outcome measures for supervised consumption services – The Ontario HIV Treatment Network (ohtn.on.ca)	
4) Not applicable	harassment and victimisation and fostering good relations).		
	Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
Can you give details of how you have engaged with equality groups with	A money advice service spoke to lone parents (predominantly	The impetus for developing this service was from the recommendations of the health needs assessment undertaken in 2015	
regard to the service review or policy	women) to better understand barriers to	(https://www.nhsggc.org.uk/media/238302/nhsggc_heal th_needs_drug_injectors_full.pdf_).	

development? What did this engagement tell you about user experience and how was this information used? The Patient **Experience and Public** Involvement team (PEPI) support NHSGGC to listen and understand what matters to people and can offer support.

Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).

- 1) Remove discrimination, harassment and $\mathbf{\Lambda}$ victimisation
- 2) Promote equality of \square opportunity
- 3) Foster good relations between protected characteristics \square
- 4) Not applicable

accessing the service. Feedback included concerns about waiting times at the drop in service, made more difficult due to child care issues. As a result the service introduced a home visit and telephone service which significantly increased uptake.

(Due regard to promoting equality of opportunity)

* The Child Poverty (Scotland) Act 2017 requires organisations to take actions to reduce poverty for children in households at risk of low incomes.

One of the sources of information from this report came from 'A consultation exercise with key stakeholders, comprising six interviews with people currently involved in public injecting, a focus group with fifteen individuals in recovery from injecting drug use, and an online consultation with thirty-three staff from health & social services, patient and family organisations, and enforcement agencies.'

Engagement:

The Glasgow City ADP has several lived and living experience reference groups. These groups will be involved in providing feedback with regards to appropriate elements of the service design and operational delivery for example:

- Layout and furnishings within the service
- Pathways and interfaces to other services
- Service user information leaflets.

The layout of the services and areas within the service for example the aftercare are, will be designed as trauma informed spaces.

Glasgow City HSCP will undertake full engagement with communities and businesses within the locality of the service.

Engagement Update

Phase 1

An engagement plan was developed with 2 main phases of planned engagement. The first phase concentrated on the immediate vicinity around the Hunter Street site and adjacent neighbourhoods, focusing on a wide variety of groups as listed in the table below.

Engagement included face to face and on line meetings, public events, newsletters and site visits.

The engagement activities have included development of a Frequently Asked Questions document, and a SDCF webpage with specific sections for:

- service users
- friends and families
- local communities
- background information
- engagement information
- frequently asked questions

<u>Safer Drug Consumption Facility | Glasgow City Health</u> and Social Care Partnership (hscp.scot)

A video has been produced to demonstrate the issues and potential impact of the SDCF on those who inject drugs, their families and the wider community. This is available both via the above website link and the Glasgow City HSCP area on YouTube.

Safer Drug Consumption Facility (youtube.com)

Weekly updates are also sent out via HSCP / ADP resources on popular social media platforms.

Phase 2

Phase 2 will begin in February 2024 and focuses on maintaining contact and updating phase 1 groups but also extending the engagement activities to the wider Glasgow City area. It is planned to hold a series of face to face drop in sessions, online sessions, physical and electronic sources of information sharing and feedback

	T	T						
			opportunities.					
			Summary of Engagement	Activity	(24/1/2	4)		
			A summary of event by sta	keholde	er group,	comple	eted	
			events, proposed events a			=		
			, ,, ,,					
			Stakeholder Group	vents Completed	Planned Events	Total Events	# of Attendees	
			People who inject drugs and recipients of associated	7	5	12	48	
			services Families, Carers and their Representatives	1	0	1	6	
			Local Communities Local Businesses	6 4	10 3	16 7	35 1	
			GCHSCP, GCC and NHSGGC Staff Providers and contractors of health and social care	2	0	3	43 61	
			services – independent and third sectors Partner Organisations	3	0	3	84	
			Housing Associations / Registered Social Landlords Integration Joint Board Members, Council Elected Members,	2	2	4	16	
			Community Councils and Health Board Members	4	4	8	0	
			Other third sector and voluntary organisations who may	2	3	5	111	
			have an interest Other	6	2	8	19	
			TOTALS	41	30	71	424	
			Research Evidence					
			Overall the evidence sugge	ests that	t establis	hment	of Safer	
			Drug Consumption Facilitie					
			public injecting, improved					
			1.			•	, and	
			decreased disposal of used					
			injecting equipment in pub	olic spac	es. The s	studies (do not	
			identify an increase in drug	g dealin	g or drug	related	d crimes	
			within the vicinity of SDCF		_			
			Drug consumption rooms:		wiew of r	arovisio	n and	
1						<u>JI UVISIU</u>	<u>II allu</u>	
			evidence www.emcdda.e	europa.	<u>eu</u>			
			https://content.health.vic.	gov.au/	<u>sites/def</u>	fault/file	es/migr	
			ated/files/collections/rese	arch-an	d-report	s/r/revi	ew-of-	
			the-medically-supervised-i					
	1	Example	Service Evidence Provided		, , , , , , , , , , , , , , , ,	202	<u>pui</u>	Possible negative impact and
		Example	Service Evidence Provided					-
								Additional Mitigating Action
								Required
	Is your service physically	An access audit of an	Location:					
5.								

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

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).

Glasgow Alcohol Drug and Recovery Services (GADRS) treatment services, for example the Enhanced Drug Treatment Service, at 55 Hunter Street, Glasgow.

The site is accessible to all via a sloped access path and roadway to a carpark with designated disabled parking bays, close to service entrances.

All entrances to the building are wheelchair accessible, with ramps and extra width doors and appropriate wheelchair turning space.

The location for the service has been identified as within the neighbourhood identified in the health needs assessment 'Taking Away the Chaos' report, as an area where public injecting by an estimated 400-500 individuals occurs on a daily basis.

The site for this service is therefore within walking distance of the target population, is accessible by car and there are nearby public transport links to the city centre. https://www.nhsggc.org.uk/media/238302/nhsggc healt h needs drug injectors full.pdf

The service has been designed with full accessibility in mind.

There are wheelchair ramps at the entrance and exit, the service is on one level within the building, the reception desk is at 2 levels with a lowered area for those in wheelchairs.

An induction hearing loop will be installed at reception.

All doors are of a size to accommodate wheelchairs.

			There are toilet facilities equipped to the appropriate standard for accessibility. Public Engagement: Glasgow City HSCP will undertake full engagement with communities and businesses within the locality of the service.	
		Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
6.	How will the service	Following a service	Service Awareness:	
	change or policy	review, an information	This service has gained extensive coverage in the press,	
	development ensure it	video to explain new	and within lived and living experience engagement	
	does not discriminate in	procedures was hosted	groups. The location of the service has been widely	
	the way it communicates	on the organisation's	reported since the IJB meeting on 27/9/23.	
	with service users and	YouTube site. This	The SDCF communication group will undertake, as per	
	staff?	was accompanied by a	their communication and engagement plan, extensive	
	Varia sidanaa ahaadd	BSL signer to explain	public and service user engagement in the run up to the	
	Your evidence should	service changes to	service opening.	
	show which of the 3 parts	Deaf service users.	Service users shall self-refer to this service, however all	
	of the General Duty have been considered (tick	Written materials	teams and services who interact with this target	
	relevant boxes).	were offered in other	population, e.g. sites who supply injecting Equipment and Naloxone, addiction teams, city centre outreach teams,	
	Televalit boxes).	languages and	hospital acute liaison teams, community pharmacies, etc.	
	1) Remove discrimination,	formats.	will be informed of, and provided with materials, to	
	harassment and	Joinnats.	promote and sign post service users to the service.	
	victimisation 🗹	(Due regard to remove	promote and sign post service asers to the service.	
		discrimination,	Stigma:	
	2) Promote equality of	harassment and	One of the aims of this service is to reduce the stigma	
	opportunity 🗹	victimisation and	associated with the use of drugs, staff play an important	
	2) 5	promote equality of	part in this and will receive training to support them to	
	3) Foster good relations	opportunity).	create a stigma free environment.	
	between protected	_ · ·	Research has shown that there is a belief that the	
	characteristics 🗹		introduction of SDCF will help to reduce stigma.	

4) Not applicable

The British Sign Language (Scotland) Act 2017 aims to raise awareness of British Sign Language and improve access to services for those using the language. Specific attention should be paid in your evidence to show how the service review or policy has taken note of this.

Parkes, T., Price, T., Foster, R. et al. 'Why would we not want to keep everybody safe?' The views of family members of people who use drugs on the implementation of drug consumption rooms in Scotland. Harm Reduct J 19, 99 (2022). https://doi.org/10.1186/s12954-022-00679-5

Engagement Activity

A variety of stakeholder engagement events have taken place.

Of the 41 completed events (24/1/24), 7 have been with those who inject drugs. The views expressed by those attending have been followed up and actioned where appropriate e.g.

- the style and look of the reception / waiting area to avoid it having a 'treatment services' feel, which many stated would be a barrier,
- the proposal to have low level seating / bean bags in the aftercare area, as used in some other SDCFs worldwide, was highlighted by lived / living experience groups as a potential problem and design options have removed these
- the potential that service users are likely, if they are to be spending some time in this service, interacting with staff and 3rd sector organisations, to want to have a smoke after they have injected. We have looked into the legal position and design constraints to providing a smoking area I the grounds of the facility to accommodate.

Staff and service users will have access to interpretation services as per HSCP / NHSGG&C Interpreting and Communication Support Policy.

Staff have access to British Sign Language services via

		interpreting services.	
		Written materials are available in a variety of languages.	
7	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(a)	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	data from ISD, and other DCR's in Europe. (see section above re demographics) Scottish Drug Misuse Database (isdscotland.org) The age cut-off is designed to help protect children as per the Children (Scotland) Act 1995. http://www.legislation.gov.uk/ukpga/1989/41/contents Anyone who attends the service who is under the age of 18 years, will be advised of, and encouraged to engage with the various services designed to specifically work with this age group e.g. ADRS Young Persons team. Service Evaluation: The Lord Advocate indicate in her statement regarding	Required
	characteristics. \Box 4) Not applicable	the provision of a Statement of Prosecution Policy, that 'there would be careful and rigorous evaluation of the facility and its effects'.	
		A planning group for the evaluation, led by NHS GGC Public Health and involving colleagues from Scottish Government, Public Health Scotland and academia, has been established and is developing costed plans for pre-	

		implementation data collection. Public Health Scotland is	
		providing funding for the necessary pre-implementation	
		preparation and baseline data collection for the	
		evaluation.	
		The evaluation is expected to consider impact on drug	
		related deaths, BBV infections, incidence of overdoses,	
		levels of public injecting as reported by both residents	
		and businesses, etc.	
		The evaluation group will also consider data from acute	
		hospital admissions and criminal justice.	
(b	Disability	Substance misuse may be both the cause and a symptom	
)		of physical or mental health problems.	
	Could the service design or policy content have a	People who inject drugs will suffer from the same	
	disproportionate impact on people due to the	physical and mental health issues as the general	
	protected characteristic of disability?	population. However their lifestyle may increase the	
		prevalence and severity of those issues.	
	Your evidence should show which of the 3 parts of		
	the General Duty have been considered (tick	Mental health issues are well documented within the	
	relevant boxes).	population of people who inject drugs. It is estimated	
	4) 5	(Carra & Johnson 2009), that 20 - 37% of patients within	
	1) Remove discrimination, harassment and	secondary mental health settings have both severe	
	victimisation	mental illness and substance misuse problem, whilst in	
	2) Promote equality of opportunity	the substance misuse setting 6 - 15 % of patients have a	
	2) Fromote equality of opportunity	co-existing severe mental illness.	
	3) Foster good relations between protected	https://www.ncbi.nlm.nih.gov/pubmed/19011722	
	characteristics.		
		Figures from the Scottish Drug Misuse database report	
	4) Not applicable	64% of patients suffering from co-existing physical issues,	
	,	and 58% with co-existing mental health issues.	
		Scottish Drug Misuse Database (isdscotland.org)	
		Substance misuse nationts may suffer from a variety of	
		Substance misuse patients may suffer from a variety of mental health issues.	
		memai nealth issues.	
		Physical and mental health problems are well	

documented within the homeless population.

https://www.gov.uk/government/publications/drug-misuse-and-dependence-uk-guidelines-on-clinical-management

Studies suggest that those who are homeless and do not also have substance misuse issues, have better access to health services and spend less time homeless than those who do misuse substances.

https://ac-els-cdn-

com.knowledge.idm.oclc.org/S0140673611608854/1s2.0-S0140673611608854-main.pdf? tid=1c6b8625c391-4b38-8aff-

<u>7e9e5d58e412&acdnat=1548758160</u> a14961f740a896df bfce913debcd12d1

Those who attend the SDCF will have access to staff who may be in a position to directly assist with physical issues e.g. wounds, infections, but will be able to assist in accessing pathways into other relevant treatment services.

Disability Information:

Additional information regarding disability will be captured, however the level of assistance staff will be able to offer will be restricted to ensure service users, staff, managers and the organisation do not commit an offence. For example a staff member may help push a wheelchair or provide written or verbal advice, they can light the heat source for the service user to then make their dose, however staff may not handle the drugs being prepared, or assist with injection or permit anyone else from assisting, doing so would breach numerous offences both for the individual, staff member, service management and the organisations.

	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(c)	Gender Reassignment	Entry to the service will be based upon eligibility criteria; sexual orientation / gender reassignment will not be a	
	Could the service change or policy have a disproportionate impact on people with the protected characteristic of Gender Reassignment?	factor, and does not form part of the eligibility criteria	
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).		
	Remove discrimination, harassment and victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected characteristics		
	4) Not applicable		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(d)	Marriage and Civil Partnership	Entry to the service will be based upon eligibility criteria; marriage or civil partnership will not be a factor, and does	-
	Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Marriage and Civil Partnership?	not form part of the eligibility criteria	
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick		

	relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics 4) Not applicable		
(e)	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, harassmentand victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics 4) Not applicable	Service users who attend the service and are pregnant will be advised of and encouraged to engage with existing well established services available for this group, since they require more specialised care. This is in line with eligibility criteria for other DCR's worldwide. Drug consumption rooms: an overview of provision and evidence www.emcdda.europa.eu	The criteria regarding no access to the service for pregnant women has been removed following engagement sessions. It was clear that this group would continue to inject, but would be at increased risk of harm since they would not have access to the support and help offered to other groups attending SDCF.
	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	Entry to the service will be based upon eligibility criteria; race will not be a factor, and does not form part of the eligibility criteria.	
	protected characteristics of Race?	Race in itself is not considered to be a factor, however the health needs assessment conducted in Glasgow, and	
	Your evidence should show which of the 3 parts of	reported in the "Taking Away the Chaos" document,	
	the General Duty have been considered (tick	would suggest that the majority of those attending the	
	relevant boxes).	service will be Scottish or British in origin.	
	4) Bancara diamininatian hanasanantan d	https://www.nhsggc.org.uk/media/238302/nhsggc_healt	
	1) Remove discrimination, harassment and victimisation	h needs drug injectors full.pdf	
	Victimisation	Access woods.	
	2) Promote equality of opportunity	Access needs: Staff and service users will have access to interpretation	
		services as per HSCP / NHSGG&C Interpreting and	
	3) Foster good relations between protected characteristics	Communication Support Policy.	
	4) Not applicable	Staff have access to British Sign Language services via interpreting services.	
		Written materials are available in a variety of languages.	
(g	Religion and Belief	Entry to the service will be based upon eligibility criteria;	
)		religion and belief will not be a factor, and does not form	
	Could the service change or policy have a	part of the eligibility criteria	
	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).		
	Remove discrimination, harassment and victimisation		

	2) Promote equality of opportunity		
	3) Foster good relations between protected		
	characteristics.		
	4) Not applicable		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(h)	Sex Could the service change or policy have a	Entry to the service will be based upon eligibility criteria; sex will not be a factor, and does not form part of the eligibility criteria.	
	disproportionate impact on the people with the protected characteristic of Sex?	As per the gender mix in the Glasgow city centre public injecting population, it is anticipated that a similar male:	
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).	female ratio of 4.3 : 1 will exist within the SDCF. h needs-drug-injectors-full.pdf	
	1) Remove discrimination, harassment and victimisation	The service has one injection area with 8 injection booths. Due to restrictions of space there are no	
	2) Promote equality of opportunity	individual areas for service users to inject, however staff will manage who enters the space and when, which	
	3) Foster good relations between protected characteristics.	booth they use, and will be observing those in the space at all times. If required individuals will be able to request the use of screens around their booth to provide privacy	
	4) Not applicable	from other service users.	
		Gender Based Violence The Glasgow City ADP Women's Reference group are to be consulted on the design of the service, and will have input into the design and finish of the aftercare space. Staff will be made aware of the NHS GG&C Gender Based	

		Violence Policy https://www.nhsggc-gbv-employee-policy-published-version-2016.pdf	
		The service will embrace the aims set out in the Scottish Government strategy Equally Safe: Equally Safe: Scotland's strategy to eradicate violence against women - gov.scot (www.gov.scot)	
		Service users who require support for Gender Based Violence will be offered help and support to link in with the various support organisations within Glasgow City Want to know more? - Glasgow City Council	
(i)	Sexual Orientation	Entry to the service will be based upon eligibility criteria; sexual orientation will not be a factor, and does not form	
	Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sexual Orientation?	part of the eligibility criteria.	
	Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).		
	Remove discrimination, harassment and victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected characteristics.		
	4) Not applicable		
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required

(i) Socio – Economic Status & Social Class

Could the proposed service change or policy have a disproportionate impact on people because of their social class or experience of poverty and what mitigating action have you taken/planned?

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 strategic decisions. If relevant, you should evidence here what steps have been taken to assess and mitigate risk of 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)

Seven useful questions to consider when seeking to demonstrate 'due regard' in relation to the Duty:

- 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 socioeconomic 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

Entry to the service will be based upon eligibility criteria; social and economic status will not be a factor, and does not form part of the eligibility criteria.

Location:

The service will be co-located on a site with existing Glasgow Alcohol Drug and Recovery Services (GADRS) treatment services, for example the Enhanced Drug Treatment Service, at 55 Hunter Street, Glasgow.

The site is accessible to all via a sloped access path and roadway to a carpark with designated disabled parking bays, close to service entrances.

All entrances to the building are wheelchair accessible, with ramps and extra width doors and appropriate wheelchair turning space.

The location for the service has been identified as within the neighbourhood identified in the health needs assessment 'Taking Away the Chaos' report, as an area where public injecting by an estimated 400 - 500 individuals occurs on a daily basis.

The site for this service is therefore within walking distance of the target population, is accessible by car and there are nearby public transport links to the city centre. https://www.nhsggc.org.uk/media/238302/nhsggc healt h needs drug injectors full.pdf

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 engaging with communities the National Standards for Community Engagement22 should be followed. Those engaged with should also be advised subsequently on how their contributions were factored into the final decision.

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?

The target population is those who inject in public spaces within Glasgow city centre. This includes those of varied and complex needs who may be homeless, ex-offenders, involved in prostitution etc. who do not currently engage with services.

Part of the aims of this service will be to engage with this group and offer opportunities for them to engage with services such as housing, benefits and other 3rd sector support organisations.

There is evidence to show that engagement with these groups in SDCF increases engagement in other treatment and support services.

review-of-the-medically-supervised-injecting-room-june-2020.pdf (health.vic.gov.au)

•	Dane the complex shows an incline development	Cost covings were not on airc of this comits have a 19 to	
8.	Does the service change or policy development	Cost savings were not an aim of this service, however it is	
	include an element of cost savings? How have you	anticipated that the service should produce cost savings	
	managed this in a way that will not	for other areas of the NHS and Criminal Justice. However	
	disproportionately impact on protected	these are not the driving factor for developing this	
	characteristic groups?	service, and are related to improvement of health and	
		socio-economic status of those attending the service	
	Your evidence should show which of the 3 parts of	through engagement with groups who currently tend not	
	the General Duty have been considered (tick	to engage with services.	
	relevant boxes).	They will not impact on those in protected characteristic	
	relevant boxes;	groups.	
	1) Remove discrimination, harassment and	groups.	
	victimisation		
	2) Promote equality of opportunity		
	3) Foster good relations between protected		
	characteristics.		
	4) Not applicable		
	,		
		Service Evidence Provided	Possible negative impact and
			Additional Mitigating Action
			Required
9.	What investment in learning has been made to	All staff will be supported to complete the mandatory	печинеи
9.	_	·	
	prevent discrimination, promote equality of	Learnpro module on equality and human rights.	
	opportunity and foster good relations between	There will be an induction training programme and	
	protected characteristic groups? As a minimum	regular training sessions for staff once the service is	
	include recorded completion rates of statutory and	operational, and equality and diversity training will be	
	mandatory learning programmes (or local	included within these on going events.	
	equivalent) covering equality, diversity and human		
	rights.		
L		l	

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.

A key aim of this service is to reduce drug related deaths and harms associated with injecting of illegal substances. This service provides a clean supervised environment where service users will receive support and advice in a non-judgemental way from staff to support and encourage for example safer injection techniques, provision of and use of naloxone to reverse the effects of overdose, access to social services to move people into appropriate accommodation if they are homeless.

All service users are informed of their rights and are informed of the availability of local advocacy services.

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*.

This is a low threshold service, aimed to engage with service users who do not regularly engage with services. The staff will engage with service users at the service users own pace, there are no expectations from delivery of this service other than to provide a clean supervised environment to protect service users form harms associated with injection of drugs. Services and pathways into services will be available if the service user wishes to engage with those services or pathways. Peer networks will be available but there is no expectation for service users to engage.

- *
- 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.

•	g completed the EQIA template, please tick which option you (Lead Reviewer) perceive best reflects the findings of the assessment. This can oss-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?(initials)
A series of phase 2 engagement events will be undertaken in the coming months with a range of groups and individuals e.g. public, businesses, elected members, lived and living experience groups, potential service users, staff.	6 months	SP / GF / SN
Full service implementation should be complete / close to completion. Final pre service opening review.	6 months	SP / GF / SN

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

29/7/2024

Lead Reviewer: Name Stuart R Notman

EQIA Sign Off: Job Title Programme Manager, Complex Needs

Signature

Date 25/01/24

Quality Assurance Sign Off: Name Alastair Low

Job Title Planning Manager

Signature Alastair Low Date 08/02/2024



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 Red	esign:
Please detail activity undertaken with regard to actions highlighted	I in the original EQIA for this Service/Policy
	Completed
	Date Initials
Action:	
Status:	
Please detail any outstanding activity with regard to required actionservice/Policy and reason for non-completion	ns highlighted in the original EQIA process for this To be Completed by
	Date Initials
Action:	
Reason:	
neuson.	
Action:	

	To be completed by
	Date Initia
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:	
Name of completing officer:	
Name of completing officer: Date submitted:	