

NHS Greater Glasgow and Clyde Equality Impact Assessment Tool

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

East Dunbartonshire HSCP Digital Strategy 2025-2030

This is a: Current Service ☐ Service Development ☐ Service Redesign ☐ New Service ☐ New Policy ☒ Policy Review ☐

Description of the service & rationale for selection for EQIA:

The HSCP Digital Strategy 2025–30 sets out a clear vision for using digital technology to improve health and social care outcomes for everyone in East Dunbartonshire. Building on significant progress and investment since 2015, this strategy aims to:

- Enable connected, inclusive, and person-centred services that improve lives.
- Support people in accessing health and social care services in ways that are convenient, responsive, and tailored to individual needs.
- Empower the workforce with the digital skills and tools required for modern service delivery.
- Promote openness, accessibility, and inclusion, ensuring that digital transformation benefits all and that no one is left behind.
- Foster collaboration across partners and stakeholders, maximising the impact of digital innovation.
- Align with national and local priorities, including the NHSGGC Digital on Demand Strategy, East Dunbartonshire Council's Digital Strategy, and the Scottish Government's Health & Social Care Service Renewal Framework.

The Digital Strategy represents a change in how health and social care services are planned and delivered, with the potential for both positive and negative impacts on individuals and groups protected under the Equality Act 2010. East Dunbartonshire HSCP undertakes an EqIA for all major policy and service changes to ensure that:

- The likely effects on people with protected characteristics are anticipated and addressed.
- Steps are taken to prevent or minimise any potential negative impacts, particularly for those at risk of digital exclusion (such as older people, disabled people, and those experiencing poverty).
- Organisational priorities around equality, inclusion, and reducing health inequalities are embedded in digital transformation.
- The Integration Joint Board (IJB) is fully informed of the potential effects of proposals before decisions are made.

Who is the lead reviewer and when did they attend Lead reviewer Training?

Name: Andy Craig

Date of Lead Reviewer Training: 09 November 2023

Please list the staff involved in carrying out this EQIA:

Andy Craig (Planning, Performance and Quality Officer)
 Alison Willacy (Planning, Performance and Quality Manager)
 Alison McCready (Chief Finance and Resources Officer)
 Digital Health & Care Strategy Board

		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.	The Digital Strategy 2025–30 is closely aligned with the HSCP Strategic Plan 2025-30 and draws on the latest Joint Strategic Needs Assessment (JSNA), which provides comprehensive demographic and equalities data for East Dunbartonshire. This includes age, gender, ethnicity, disability (physical, learning, sensory), mental health, and socio-economic status. The strategy also references national and local data on digital exclusion, particularly among older people, disabled people, and those experiencing poverty.	Demographic analysis continues to show that digital exclusion disproportionately affects older people, disabled people, and those experiencing poverty. Each digital transformation programme will be subject to further equality impact assessment, with targeted mitigations.
2.	Please provide details of how data captured has been/will be used to inform policy content or service design. Your evidence should show which of the 3 parts of the General Duty have been considered. 1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/> 2) Promote equality of opportunity <input checked="" type="checkbox"/> 3) Foster good relations between protected characteristics. <input checked="" type="checkbox"/> 4) Not applicable <input type="checkbox"/>	Data from the JSNA and ongoing digital maturity assessments have directly informed the priorities and design of the Digital Strategy 2025-30. The strategy's principles and themes are shaped by evidence of digital exclusion and the need to promote inclusion, accessibility, and equity. The strategy commits to using data to identify and address inequalities, and to ensure that digital solutions are designed with the needs of all protected groups in mind.	Individual programmes of work associated with the Digital Strategy may be subject to equality impact assessment, informed by the data captured. Where disproportionate impact levels of digital exclusion are identified, appropriate adjustments will be put in place.

		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? Your evidence should show which of the 3 parts of the General Duty have been considered.</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 strategy is informed by research and best practice on digital inclusion, including national frameworks and local engagement. Evidence highlights that digital exclusion is most acute among older adults, disabled people, and those in poverty. The strategy therefore embeds digital inclusion as a core principle, with actions to remove barriers, support digital skills, and ensure that digital transformation does not widen inequalities. The evidence gathered, particularly the patterning of digital exclusion among older people, disabled people, and those experiencing poverty, has directly shaped the strategy's priorities. This has led to a strong emphasis on digital inclusion, alternative access routes, and ongoing engagement with affected groups. These insights will continue to inform the design and delivery of all digital programmes under the strategy.</p>	<p>Individual programmes of work associated with the Digital Strategy may be subject to equality impact assessment, informed by the data captured. Where disproportionate impact levels of digital exclusion are identified, appropriate adjustments will be put in place.</p>
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. Your evidence should show which of the 3 parts of the General Duty have been considered</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>Two periods of public consultation were carried out in the development of the Strategic Plan, which underpins the Digital Strategy. In addition to online public consultation, there was substantial discussion across the range of HSCP governance and representative groups including:</p> <ul style="list-style-type: none"> • HSCP Board • Strategic Planning Group • Joint Staff Partnership Forum • Public Service User and Carer Forum • HSCP Leadership Forum • Local third sector network • Carers Partnership Group 	<p>Further engagement will be carried out for individual digital projects, with additional mitigations and adjustments as required to ensure no group is left behind.</p>

		Service Evidence Provided	Possible Negative Impact and Additional Mitigating Action Required
	3) Foster good relations between protected characteristics <input checked="" type="checkbox"/> 4) Not applicable <input type="checkbox"/>	Further engagement will be carried out in relation to individual programmes of work that introduce service changes.	
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? Your evidence should show which of the 3 parts of the General Duty have been considered.</p> 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"/>	The Digital Strategy and related information will be accessible via the HSCP website and through alternative formats on request. Physical accessibility is considered in the design of digital and non-digital service delivery channels.	Ongoing review of accessibility arrangements will ensure that all users can access services, with reasonable adjustments made as 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? Your evidence should show which of the 3 parts of the General Duty have been considered.</p> 1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/> 2) Promote equality of opportunity <input checked="" type="checkbox"/> 3) Foster good relations between protected characteristics <input checked="" type="checkbox"/> 4) Not applicable <input type="checkbox"/>	The development of the Strategic Plan and Digital Strategy was influenced by, and reflects, patient, service user, carer and staff experience in addition to other stakeholders. The HSCP follows guidance and governance from both East Dunbartonshire Council and NHSGG&C in relation to providing clear communication and in meeting our legal requirements in relation to communications.	Guidance and governance to be followed in relation to the communication of the Digital Strategy to service users and staff.

	Protected Characteristic	Service Evidence Provided	Possible Negative Impact and Additional Mitigating Action Required
7a	<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). Your evidence should show which of the 3 parts of the General Duty have been considered.</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>Although age is not in itself a barrier to using digital services, many of the factors that can make this difficult are more common for older people.</p> <p>In common with the rest of Scotland, East Dunbartonshire's population profile is changing in all age categories. A combination of factors, including healthier lifestyles, advances in medicine and lower birth rates, means that there are more older people (aged 65 and over) in our society and proportionally fewer children and people of working age.</p> <p>The Joint Strategic Needs Assessment projects a 7.6% increase in the overall population of East Dunbartonshire from 2018-2043 due to a significant estimated rise in the population aged over 65 years. The largest increase is in individuals aged over 85 years, which is projected to rise by over 100% from 3,203 to 7,017 people by 2043.</p>	<p>Individual programmes of work associated with the Digital Strategy may be subject to equality impact assessment and where disproportionate impact for other marginalised groups is found, proportionate adjustments will be put in place. Further engagement will also be carried out where appropriate, to ensure that people who are digitally excluded are not left behind.</p>
7b	<p>Disability</p> <p>Could the service design or policy content have a disproportionate impact on people due to the protected characteristic of disability? Your evidence should show which of the 3 parts of the General Duty have been considered.</p> <p>1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/></p>	<p>The Joint Strategic Needs Assessment reports that 8.6% of the adult population in East Dunbartonshire reported a physical disability in the 2022 Census, and 3.9% of the population had one or more of learning disability, learning difficulty or developmental disorder.</p> <p>The Glasgow Disability Alliance reported survey findings in 2022 that 60% of disabled respondents faced digital exclusion, no access to devices, or Wi-Fi, and/or lacked confidence to use it.</p>	<p>Individual programmes of work associated with the Digital Strategy may be subject to equality impact assessment and where disproportionate impact for other marginalised groups is found, proportionate adjustments will be put in place.</p>


	Protected Characteristic	Service Evidence Provided	Possible Negative Impact and Additional Mitigating Action Required
	2) Promote equality of opportunity <input checked="" type="checkbox"/> 3) Foster good relations between protected characteristics. <input checked="" type="checkbox"/> 4) Not applicable <input type="checkbox"/>	While there will be positive impacts resulting from the ongoing commitment to deliver digital solutions to service challenges, we appreciate that digital still presents barriers to access for some disabled people.	
7c	Gender Reassignment Could the service change or policy have a disproportionate impact on people with the protected characteristic of Gender Reassignment? Your evidence should show which of the 3 parts of the General Duty have been considered. 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"/>	No anticipated impact.	N/A
7d	Marriage and Civil Partnership Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Marriage and Civil Partnership? Your evidence should show which of the 3 parts of the General Duty have been considered. 1) Remove discrimination, harassment and victimisation <input type="checkbox"/>	No anticipated impact.	N/A

	Protected Characteristic	Service Evidence Provided	Possible Negative Impact and Additional Mitigating Action Required
	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"/>		
7e	Pregnancy and Maternity Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Pregnancy and Maternity? Your evidence should show which of the 3 parts of the General Duty have been considered. 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"/>	No anticipated impact.	N/A
7f	Race Could the service change or policy have a disproportionate impact on people with the protected characteristics of Race? Your evidence should show which of the 3 parts of the General Duty have been considered. 1) Remove discrimination, harassment and victimisation <input checked="" type="checkbox"/>	While current evidence does not indicate a disproportionate impact on people due to race, we recognise that language barriers and digital literacy may affect some ethnic minority groups. We are committed to providing translated materials where needed and engaging with community groups to identify and address any emerging barriers to digital inclusion.	N/A

	Protected Characteristic	Service Evidence Provided	Possible Negative Impact and Additional Mitigating Action Required
	2) Promote equality of opportunity <input checked="" type="checkbox"/> 3) Foster good relations between protected characteristics <input checked="" type="checkbox"/> 4) Not applicable <input type="checkbox"/>		
7g	Religion and Belief Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Religion and Belief? Your evidence should show which of the 3 parts of the General Duty have been considered. 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"/>	No anticipated impact.	N/A
7h	Sex Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sex? Your evidence should show which of the 3 parts of the General Duty have been considered. 1) Remove discrimination, harassment and victimisation <input type="checkbox"/>	No anticipated impact.	N/A

	Protected Characteristic	Service Evidence Provided	Possible Negative Impact and Additional Mitigating Action Required
	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"/>		
7i	Sexual Orientation Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sexual Orientation? Your evidence should show which of the 3 parts of the General Duty have been considered. 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"/>	No anticipated impact.	N/A
7j	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 <u>strategic</u> decisions. If relevant, you should evidence here what	Poverty is often cited as the single biggest determinant of digital exclusion, compounding barriers for other protected characteristic groups. The Carnegie Trust (2016) found a strong relationship between SIMD and internet uptake with uptake amongst the 10% most deprived areas in Scotland sitting at 53% compared to 81% for the 10% least deprived areas. The Digital Poverty Alliance state that 53% of people who are offline can't afford to pay an average monthly broadband bill.	Individual programmes of work associated with the Digital Strategy may be subject to equality impact assessment and where disproportionate impact for other marginalised groups is found, proportionate adjustments will be put in place.

	Protected Characteristic	Service Evidence Provided	Possible Negative Impact and Additional Mitigating Action Required
	steps have been taken to assess and mitigate risk of exacerbating inequality on the ground of socio-economic status.	The Scottish Index of Multiple Deprivation (SIMD) ranks data zones (small areas with an average population of 800 people), from the most deprived to the least deprived. Using deciles, with 1 being the most deprived and 10 being least deprived. Although the majority of the population lives in the least deprived deciles, there are three data zone areas in East Dunbartonshire categorised in the 10% most deprived in Scotland. There are two in the Hillhead area of Kirkintilloch and one in Lennoxton. There are a further two data zones in the next deprived 10%, one located in Hillhead and the other located in Kirkintilloch West.	
7k	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?	There may be some groups who experience higher levels of digital exclusion and therefore may not benefit (or may be further removed) from digital-based service improvements.	Individual programmes of work associated with the Digital Strategy may be subject to equality impact assessment and where disproportionate impact for other marginalised groups is found, proportionate adjustments will be put in place.
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. 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"/>	Individual projects and programmes may deliver cost savings through reducing admin burden and other means. It is not anticipated that any of these would disproportionately impact on protected characteristic groups. All major programmes will follow a business case approach and this will include an EqIA to determine any disproportionate impact on people with protected characteristics.	N/A

	Protected Characteristic	Service Evidence Provided	Possible Negative Impact and Additional Mitigating Action Required
	4) Not applicable 		
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.	East Dunbartonshire HSCP is committed to regularly training and empowering staff on equalities issues in order to prevent discrimination, promote equality of opportunity and foster good relations between protected characteristic groups.	N/A

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.

There are no reported risks in relation to human rights.

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* .

No specific or definable approach was applied in the development of the Digital Strategy, but the PANEL principles underpin the general approach to all plans developed by the HSCP, particularly in respect of maximising participation, preventing discrimination and promoting equality and empowerment of communities.

*

- **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.

United Nations Convention on the Rights of the Child

The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024 came into force on the 16th July 2024. All public bodies may choose to evidence consideration of the possible impact of decisions on the rights of children (up to the age of 18). Evidence should be included below in relation to the General Principles of the Act. The full list of articles to be considered is available [here](#) for information.

No Discrimination: Where the decision may have an impact, explain how the EQIA has considered discrimination on the grounds of protected characteristics for children. You may have considered children in each of the EQIA sections and returned relevant evidence.

No anticipated impact.

Best Interests of the child: Where the decision may have an impact, explain how the EQIA has evaluated possible negative, positive or neutral impacts on children. You may find that a options considered need to be reframed against the best possible outcome for children.

The strategy aims to ensure that digital transformation benefits all and that no one is left behind.

Life, survival and development: Where the decision may have an impact, explain how the EQIA has considered a child's right to health and more holistic development opportunities.

No anticipated impact.

Respect of children's views: Where the decision may have an impact, explain how the views of children have been sought and responded to. You need to consider what steps were taken in Q4 in relation to this.

No anticipated impact.

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.

N/A

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

Date for completion

Who is responsible?(initials)

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

Lead Reviewer:
EQIA Sign Off:

Andy Craig
Planning Performance and Quality Officer
Andy Craig
23/09/2025

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:

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