

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:
East Dunbartonshire Health and Social Care Partnership (HSCP) Commissioned Sheltered Housing Support Services
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.
Introduction
The Public Bodies (Joint Working) (Scotland) Act 2014 received Royal Assent, completing the process of legislation through Parliament, on 1 April 2014. The Act aims to
support improvement in the quality and consistency of services through the integration of health and social care. East Dunbartonshire Health and Social Care Partnership
(HSCP) has integrated planning and delivery of all community health and social care services, including services for children, adults, criminal justice and older people.
The first East Dunbartonshire HSCP Strategic Plan (2015-18), which was approved by the IJB Board in February 2015 and subsequent Strategic Plans (2018-21 and 2022-
25) outlines clear visions whereby all HSCP services and stakeholders work in partnership with older people, their carers, families and communities to support them to stay
at home or in a homely setting for as long as possible. The Strategic Plan's of 2015-18, 2018-21 and the 2022-25 plan were created by accumulated programmes of
community engagement and consultation work which was led by the HSCP in partnership with other health and council service(s) such as social work and housing and also
with the third and independent sectors, housing associations and community groups and local service users, carers and their families, these all outline the HSCP's ambition
to further improve the opportunities for people to live a long and healthy life.
As also stated in the Strategic Plan (20233-25) East Dunbartonshire HSCP is committed to making financial decisions in a fair, transparent and accountable way that will
consider the needs and the rights of our local people and the communities of East Dunbartonshire, in line with the Public Bodies (Joint Working) (Scotland) Act 2014 and the
Public Sector Equality Duty and Fairer Scotland duties. To support meeting these duties, proposals for the policy review of the Commissioned Sheltered Housing Support
Services have been subject to an Equality Impact Assessment (EqIA) to understand the impacts and to inform the development of any proposed proposals, and to take
steps to mitigate any impacts identified, wherever possible if the proposals are accepted by the Integrated Joint Board (LIB)

As part of the 2024/25 budget setting process, the Commissioned Sheltered Housing Support Services was identified as a potential financial saving, but also the potential to have a negative impact on groups who share a protected characteristic. The purpose of the EqIA is for the identification of any potentially negative impact, this does not mean that the financial savings option cannot go forward. However, where this has been identified, the HSCP will liaise with the housing associations who operate the sheltered housing accommodations and are responsible for managing any changes to their budgets and engaging with their tenant's to mitigate with the aim of minimising any impacts should the option be approved.

Where relevant within the proposals, the HSCP as a public body, should be satisfied that there is a compelling case in the public interest under statutory services provision that there is sufficient justification for interfering with the equalities and human rights of those with an interest in the proposals that may be affected in any potential financial savings In this respect the Human Rights Act 1998 incorporates certain provisions of the <u>European Convention on Human Rights</u>, namely:

- a) Article 1 the right of everyone to peaceful enjoyment of possessions. No one can be deprived of possessions except in the public interest and subject to the relevant national and international laws.
- b) Article 8 private and family life, home and correspondence. No public authority can interfere with these rights except if it is in accordance with the law and is necessary in the interests of national security, public safety or the economic well-being of a country.
- c) Article 14 the right to enjoy rights and freedoms in the Convention free from discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, or national or social origin.

In the case of each of these articles, the HSCP, will be conscious of the need to strike a balance between the rights of the individual and the interests of the public. The HSCP/IJB may decide that, in the light of the present lessened requirements for this type of service / model and the significant public benefit of the policy review and any financial benefit which would arise from the proposed policy review being released for other critical services, it is necessary and proportionate. In particular, the HSCP who, due to the Sheltered Housing Units being managed by housing associations, with no HSCP input and the residents not being direct HSCP clients, the HSCP may consider that the policy review and the potential financial savings would not constitute any unlawful interference with individual tenants/property rights as these contracts are with the housing associations.

Background

To help establish and develop housing support services, the <u>British Government Supporting People programme</u> was launched in 2003, as a £1.8 billion ring fenced grant to local authorities intended to fund services to help vulnerable people live independently. Aligned to housing legislation, housing support services consist of <u>21 tasks related to securing and maintaining a tenancy</u>. At the time, Individuals and services were assessed, with funding allocated if/where applicable. Local sheltered housing support services benefitted as grant funding was allocated to help fund / commission the provision of an onsite warden service. In 2010, the ring fencing of the grant funding was removed, allowing local authorities the autonomy to allocate funding accordingly – in line with eligibility criteria and priorities. However, since then and primarily related to the introduction and acceleration of free personal care in 2002, increasing demand, the need for more costly & complex services in the community, increasing eligibility criteria and year on year budget pressures, the requirement for this type of service / model - which essentially is considered low risk / low impact, lessened.

Current situation

The three Commissioned Sheltered Housing Support Services, receive £159,779.53 in total funding annually for a warden service, they are:

Hanover Housing / Callieburn Court (£106,101.67) – is a very sheltered housing complex for frail older people. Located in Bishopbriggs, the complex has 16 one bed / studio flats supported by a housing support service which consists of support staff on site 24/7 to assist with housing related matters. Telecare is activated each night from 10pm – 8am whilst staff are on sleep over duty. Communal facilities include laundry, gardening, window cleaning etc.

There is no existing warden service at Callieburn court. The HSCP provide a separate commissioned service for frail older people to have staff available from 8am to 10pm through Hanover Housing. There is a telecare system that is on in the night time from 10pm to 8am. The HSCP also commission Care at Home service through a separate Care at Home organisation for those residents who have been assessed as requiring a level of care.

Trust Housing / Huntly Court (£30,059.60) - is Retirement Housing located in Bishopbriggs. The complex has 37 one-bedroom flats supported by a housing support service which includes: on site staff across varying hours, Careline alarm service, communal lounge, laundry, guest, and garden facilities.

There is no existing warden service at Huntly court. The HSCP also commission Care at Home service through a separate Care at Home organisation for those residents who have been assessed as requiring a level of care and service users also have access to telecare and telehealth services if assessed as this being a need.

Trust Housing / Schaw Court (£23,618.26) - is Retirement Housing located in Bearsden. The complex has 33 studio flats, one-bedroom flats and one three-bedroom flat. Like Huntly Court, the service provided at Schaw Court includes on site staff across varying hours providing a housing support service, Careline alarm service, communal lounge, laundry, guest, and garden facilities.

There is no existing warden service at Schaw court. The HSCP also commission Care at Home service through a separate Care at Home organisation for those residents who have been assessed as requiring a level of care and service users also have access to telecare and telehealth services if assessed as this being a need. .

This EqIA recognises that any residents that may be affected by the policy, will all have legitimate needs and expectations. As such, general principles apply across all affected groups, and include:

- Keeping residents fully informed about issues that affect them
- Giving them the opportunity to express their views and that these are taken into account, and;
- Providing appropriate support, including advice, assistance and signposting to appropriate services.

East Dunbartonshire HSCP has had no form of communication with any residents who may be affected by the proposed policy, this is due to the Sheltered Housing Units being managed by housing associations, with no HSCP input, the residents are not HSCP clients, with no way of communicating with them. The HSCP commission Care at Home organisations to provide care for those who have been assessed as requiring this. We have no direct contact with the service users or carers.

The HSCP will engage with the Housing Associations as described in the legal contract. If the policy review is approved by the IJB, the HSCP will engage with the Housing Associations/Providers. The Housing Associations/Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010). The HSCP is willing to engage with the residents/carers through the Housing Associations and provide appropriate signposting to other HSCP commissioned services as appropriate that may mitigate any amendments to current services should they occur.

Tenants of the properties pay rent on a monthly / annual basis for their accommodation and support. Any additional service requirements such as personal care & support is not included in the rent or provided via the service / staff on site and is typically provided via the HSCP's who commission Care at Home services. Funding via the HSCP contributes towards staffing overheads across each of the three services, the HSCP has no direct involvement with any of the services and there are no housing support assessments undertaken by the HSCP or commissioning outcomes captured or recorded. Furthermore, the HSCP does not have any input or say over how these services operate or develop and there is no opportunity to access or refer onto each housing allocation list. The HSCP has no way of contacting or engaging with the tenants of the properties to consult with them. The HSCP does now know who the residents are and/or who lives in these properties, the HSCP is unaware of the demographic make-up of the clients and is unaware of the protected characteristics of the tenants such as sex, age, who have a disability and/or who has carers.

Subject to IJB approval, the Head of Service / Strategic Commissioning Manager will plan to meet with both providers (separately) to convey the IJB's decision and related contractual obligations. The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010). If requested East Dunbartonshire HSCP would consider to liaising with the providers to provide information/signposting onto other commissioned services that may assist to mitigate if service modifications transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist. On application, the HSCP can make this available in both easy read versions and other languages on application. The HSCP can also refer and signpost to commissioned third sector organisations who provide information and assistance on a range of services for older, disabled and to people from all sexes including those suffering socio-economic challenges.

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.)

East Dunbartonshire HSCP undertakes an EQIA on changes to policy or services, and decisions that may have disproportionate impacts on individuals or groups protected under the <u>Equality Act 2010</u>. We believe that it is good practice when developing a policy, strategy or a new initiative to anticipate the likely effects it may have, and to take steps to prevent or minimise, any likely harmful effects, especially on persons who share any of the characteristics that are protected under the Equality Act (2010).

The relevant protected characteristics covered by the Duty are:

• Age

- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex, and;
- Sexual Orientation.

East Dunbartonshire HSCP is also cognisant and wish to mitigate for reasons to do with economic status & social class.

The East Dunbartonshire HSCP Strategic Plan (2022-25) outlines 8 key priorities that apply to all HSCP services and will:

- promote positive health and wellbeing, preventing ill-health and building strong communities
- enhance the quality of life and supporting independence for people, particularly those with long-term conditions
- keep people out of hospital when care can be delivered closer to home
- address inequalities and support people to have more choice and control
- people have a positive experience of health and social care services
- promote independent living through the provision of suitable housing accommodation and support
- improve support for Carers enabling them to continue in their caring role, and;
- optimise efficiency, effectiveness and flexibility.

The HSCP policy review and the potential financial saving is intended to benefit all East Dunbartonshire residents of all ages and backgrounds, regardless of any disabilities, impairments or socio-economic status for the financial health of the organisation in the longer term. This Equalities Impact Assessment (EqIA) considers the affects that this programme could have on residents living in sheltered housing services accommodation owned or managed by the housing associations and seeks to identify and mitigate any disproportionate disadvantage that may arise for these tenants that identify with any of the protected groups recognised by equality legislation. The HSCP, recognises that residents living in sheltered housing services accommodation have specific needs that do not always correlate to those living in general needs properties. This EqIA recognises that residents affected by the Regeneration Programme all have legitimate needs and expectations. As such, general principles apply across all affected groups, and include:

- to eliminate unlawful discrimination
- · advance equality of opportunity, and;
- promote good relations.

Throughout this EqIA, reference will also be made to the general duties (Equality Act (2010) and to the HSCP Equalities Mainstreaming Report (2023-2027) policy document and will articulate how any proposed changes in service provision will meet the requirement.

East Dunbartonshire HSCP also aims to ensure that disadvantaged groups are not further disadvantaged by the policies and strategies we implement. It also ensures that the IJB are properly advised of the potential effects of proposals before they take decisions that affect people's lives. The HSCP is also required to fully consider the equality aspects for all vulnerable people and protected characteristic groups for all of our commissioned services. In normal circumstances the HSCP would look to carry out, involve, consult and engage with stakeholders, including those who have one or more protected characteristic, but due to the nature of the commissioned provider / organisational arrangements to the service provision, the HSCP has no feasible way to communicate with any groups or individuals who have a protected characteristics and may be affected by the decision. The EQIA has been undertaken to ensure that overall any adverse impact on protected characteristic groups is minimised as a result of the proposal and that the equalities duties placed upon us by the Equality Act (2010) are upheld.

From the above and our knowledge gathered from the East Dunbartonshire Joint Strategic Needs Assessment (2021) it can be identified that there is potential for a cumulative impact for the protected characteristics of residents who reside in Sheltered Housing units, such as Disability, Age (Older People in particular) and Sex (Women in particular). Between 2003 and 2013, East Dunbartonshire experienced the fastest growing increase in people aged 85+ of any local authority in Scotland (from 1,672 to 2,660: an increase of 59%), with steepening future projections. The predicted rise in the population of people aged 85 years + in East Dunbartonshire has come to pass, with consequential pressure on services and resources. In the period 2008-2018, East Dunbartonshire continued to experience the largest national increase in the 85 years + population from 2,086 in 2008 to 3203 in 2018. To mitigate, many people living in sheltered housing receive HSCP commissioned care at home services and/or have telecare in place which is responded to by HSCP care at home staff. Some people will also have Supported Living packages in place to support them with independent living tasks. By the purpose of sheltered housing, it will be populated by a higher proportion of older people, some residents may have a disability and the largest percentage may be women and some people may be living in fuel poverty due to increased costs in utilities.

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: Anthony Craig (HSCP Development Officer)	Date of Lead Reviewer Training: 10 May 2018

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):

Derrick Pearce (HSCP - Interim Chief Officer)

Gillian Healey (HSCP - Planning and Commissioning Manager)

Stephen MacDonald – (HSCP - Joint Service Manager, Older People)

Kelly Gainty (HSCP - Self Directed Support Lead Officer/Team Manager for Local Area Co-ordination for Older People Team)

		Example	Service Evidence Provided	Possible negative impact and
				Additional Mitigating Action
				Required
1.	What equalities information	A sexual health service	East Dunbartonshire HSCP has had no communication with any	The Providers are responsible for
	is routinely collected from	collects service user	people who may be affected by the proposed policy, this is due	managing any changes to their
	people currently using the	data covering all 9	to the Sheltered Housing Units being managed by housing	budgets and engaging with tenants
	service or affected by the	protected	associations, with no HSCP input, the residents are not HSCP	regarding any related financial
	policy? If this is a new	characteristics to enable	clients, with no way of communicating with them.	impact. Should the provider choose
	service proposal what data	them to monitor patterns		to withdraw or amend any current
	do you have on proposed	of use.	The only time the HSCP may have contact is when they are	services or provision, the provider
	service user groups. Please		known to other HSCP services. The HSCP collate information	should engage with their clients and
	note any barriers to		when we provide direct service provision, for instance through	service users to mitigate if there is
	collecting this data in your		Care at Home service, Telecare/Telehealth, Occupational	any modifications to the services
	submitted evidence and an		Therapy, Nursing Services. When original patient data is	under the Equality Act (2010).
	explanation for any		collected, this will be via Carefirst, TrakCare and EMIS. These	
	protected characteristic		systems allow additional information relating to support needs to	If requested East Dunbartonshire
	data omitted.		be recorded. BME recording is also recorded. TrakCare, the	HSCP would consider to liaising with
			patient information management system used across NHSGGC	the providers and their clients to
			has options to record a patient's age, sex, postcode, religion and	provide information/signposting onto
			belief, ethnicity and whether the patient required interpreting	other services that may assist to
			support as well as their additional needs.	mitigate if service adjustments
			When the HSCP provide direct service provision, staff are also	transpire. For instance this could be
			cognisant of other services they can signpost to, either internal	for the creation of a customer service
			or with a commissioned third sector provider.	leaflet signposting pathways for other
				services that may assist.
				On application, the USCD can make
				On application, the HSCP can make
				information available in both easy
				read versions and community

			languages. The HSCP can also refer and signpost to commissioned third sector organisations who provide information and assistance on a range of services for older, disabled and to people from all sexes including those suffering socioeconomic challenges.
	Example	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
 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 (tick relevant boxes). Remove discrimination, harassment and victimisation Promote equality of opportunity Foster good relations between protected characteristics. 	A physical 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)	A stated ambition of the East Dunbartonshire Health and Social Care Partnership is to mitigate the circumstances that lead to inequality and inequity. The HSCP has no formal contact with the service users/carers who may be affected as they are not our clients, only if the service user/carer has direct contact through a HSCP service and then data will be reviewed and utilised to benefit the individual by signposting to appropriate services. By the nature of sheltered housing, the majority of service users will be older, disabled and female. Throughout the planning and creation of any East Dunbartonshire HSCP programme/strategy, the HSCP will adopt an approach that will strive to be clear and concise ('Plain English'); accessible (with arrangements in place to adapt styles, formats, layouts, community languages (The British Sign Language (BSL) (Scotland) Act 2015) and material) and inclusive, and that the programme is fluid and can adapt to meet the communication needs and preferences of different audiences including those with protected characteristics (e.g.,	The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010). If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other

to-face communications over social media). On application, the HSCP can information available in both expressions and community languages on application. Those with disabilities, woman minority ethnic groups are more to be living in poverty in East Dunbartonshire, by the purpos sheltered housing, older people.	and e likely e of e are
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sheltered housing, older people	
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mitigate the HSCP can also re	
signpost to commissioned third	
sector organisations who provi	
information and assistance on	
range of services for older, dis	bled
and to people from all sexes	
including those suffering socio	
economic challenges.	
Example Service Evidence Provided Possible negative impact	
Additional Mitigating Act	on
Required 3. How have you applied Looked after and East Dunbartonshire HSCP has had no communication with any The Providers are responsible	or
3. How have you applied Looked after and Looked after and Laccommodated care East Dunbartonshire HSCP has had no communication with any The Providers are responsible people who may be affected by the proposed policy, this is due managing any changes to their	
evidence about the services reviewed a to the Sheltered Housing Units being managed by housing budgets and engaging with ter	
experience of equality range of research associations, with no HSCP input. regarding any related financial	כוווג
groups to the service or evidence to help promote impact. Should the provider of	100SE
Policy? The only time the HSCP may have contact is when they are to withdraw or amend any curr	
environment. Research known to other HSCP services. The HSCP collate information services or provision, the provi	
Your evidence should show suggested that young when we provide direct service provision, for instance through should engage with their client	
which of the 3 parts of the LGBT+ people had a Care at Home service, Telecare/Telehealth, Occupational service users to mitigate if there	
General Duty have been disproportionately Therapy, Nursing Services. When original patient data is any modifications to the service	
considered (tick relevant difficult time through collected, this will be via Carefirst, TrakCare and EMIS. These under the Equality Act (2010).	

boxes).
Remove discrimination, harassment and victimisation
2) Promote equality of opportunity
3) Foster good relations between protected characteristics
4) Not applicable

exposure to bullying and harassment. As a result staff were trained in LGBT+ issues and were more confident in asking related questions to young people. (Due regard to removing discrimination, harassment and victimisation and fostering good relations).

systems allow additional information relating to support needs to be recorded. BME recording is also recorded. TrakCare, the patient information management system used across NHSGGC has options to record a patient's age, sex, postcode, religion and belief, ethnicity and whether the patient required interpreting support as well as their additional needs.

When the HSCP provide direct service provision, staff are also cognisant of other services they can signpost to, either internal or with a commissioned third sector provider. For instance the HSCP Local Area Co-ordination (LAC) Team for Older People was created due to the learning from the Day Services for Older Peoples Strategy in 2020. The LAC team received 214 referrals during the period of 1st April 2021 to 31st March 2022. The majority of customer referrals received during that period resided in Bearsden and Kirkintilloch and had a main health diagnosis of Dementia/Alzheimer's.

When preparing any new strategy/policy, the HSCP Board must ensure that all of these stakeholders and partners are fully engaged in the process and have regard to the <u>Health and Social Care Delivery Principles</u>. This ensures that a shared approach is taken to the planning of services to deliver the <u>National Outcomes for Health and Wellbeing</u> and to achieve the core aims of integration, which are:

- To improve the quality and consistency of services for patients, carers, service users and their families
- To provide seamless, integrated, quality health and social care services in order to care for people in their homes, or a homely setting, where it is safe to do so; and;
- To ensure resources are used effectively and efficiently to deliver services that meet the needs of the increasing number of people with long term conditions and often complex needs, many of whom are older.

If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist.

On application, the HSCP can make information available in both easy read versions and community languages on application.

Those with disabilities, woman and minority ethnic groups are more likely to be living in poverty in East Dunbartonshire, by the purpose of sheltered housing, older people are also shown to live in fuel poverty, to mitigate the HSCP can also refer and signpost to commissioned third sector organisations who provide information and assistance on a range of services for older, disabled and to people from all sexes including those suffering socioeconomic challenges.

		Example	By adopting this approach, we will aim to ensure that we remove discrimination, promote equality of opportunity and foster good relations between protected characteristics. Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
4.	Can you give details of how you have engaged with equality groups with regard to the service review or policy development? What did this engagement tell you about user experience and how was this information used? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation	A money advice service spoke to lone parents (predominantly women) to better understand barriers to accessing the service. Feedback included concerns about waiting times at the drop in service, made more difficult due to child care issues. As a result the service introduced a home visit and telephone service which significantly increased uptake. (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.	East Dunbartonshire HSCP has had no communication with any people who may be affected by the proposed policy, this is due to the Sheltered Housing Units being managed by housing associations, with no HSCP input. HSCP Boards are collaborative at heart; they include membership from Local Authorities and Health Boards, plus representatives of service users, unpaid carers, professionals and clinicians, trade unions and third and independent sector service providers and housing associations and other stakeholders. When preparing any new strategy or policy, the HSCP Board must ensure that all of these stakeholders and partners are fully engaged in the process and have regard to the Health and Social Care Delivery Principles. This ensures that a shared approach is taken to the planning of services to deliver the National Outcomes for Health and Wellbeing and to achieve the core aims of integration, which are: • To improve the quality and consistency of services for patients, carers, service users and their families • To provide seamless, integrated, quality health and social care services in order to care for people in their homes, or a homely setting, where it is safe to do so; and; • To ensure resources are used effectively and efficiently to deliver services that meet the needs of the increasing number of people with long term conditions and often complex needs, many of whom are older.	The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010). If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist. On application, the HSCP can make information available in both easy read versions and community languages on application.

		Example	By adopting this approach, we will aim to ensure that we remove discrimination, promote equality of opportunity and foster good relations between protected characteristics. Different HSCPs have different pressures and population needs. It is important that we ensure that the HSCP provides statutory services, but also emphasise that by looking at the main pressures (or "drivers") for change and improvement. Analysis of the local populations and their needs is carried out and that any mitigation(s) of any service change/re-design is we will continue to be committed to consider for any future communication activity, the specific needs and preferences of the communications audience including protected characteristic groups. Service Evidence Provided	Those with disabilities, woman and minority ethnic groups are more likely to be living in poverty in East Dunbartonshire by the nature of sheltered housing, older people are also shown to live in fuel poverty, to mitigate the HSCP can also refer and signpost to commissioned third sector organisations who provide information and assistance on a range of services for older, disabled and to people from all sexes including those suffering socioeconomic challenges. Possible negative impact and Additional Mitigating Action Required
5.	Is your service physically accessible to everyone? If this is a policy that impacts on movement of service users through areas are there potential barriers that need to be addressed? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation	An access audit of an outpatient physiotherapy department found that users were required to negotiate 2 sets of heavy manual pull doors to access the service. A request was placed to have the doors retained by magnets that could deactivate in the event of a fire. (Due regard to remove discrimination, harassment and victimisation).	The Sheltered Housing Units are managed by housing associations, with no HSCP input, the residents are not HSCP clients, the only time the HSCP may have contact is when they are known to other HSCP services. The HSCP do ask their suppliers and those they commission services from to take certain steps in order to enable the public authority to meet their continuing legal obligation to comply with the Equality Duty.	The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010). If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to

	2) Promote equality of opportunity 3) Foster good relations between protected characteristics. 4) Not applicable			mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist. On application, the HSCP can make information available in both easy read versions and community
		Example	Service Evidence Provided	languages on application. Possible negative impact and Additional Mitigating Action Required
6.	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 (tick relevant boxes). 1) Remove discrimination,	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. Written materials were offered in other languages and formats.	As discussed previously, the HSCP has no role in or influence in the allocation of housing in these properties. Those who live in the properties are not living there as a result of a formal assessment carried out by the HSCP. The HSCP has no input or knowledge of the people who reside in the properties. The HSCP can liaise with the providers and is willing to work with them and produce a customer service leaflet noting the customer's options and signposting pathways for other services that may assist. The HSCP will ensure- that this is available in both easy read versions and other languages on application. The Policy and associated customer leaflets will be evaluated for accessibility within the local established guides as detailed in the "Accessible Information Policy (Clear to All)" before being	The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010). If requested East Dunbartonshire HSCP would consider to liaising with
	harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics	(Due regard to remove discrimination, harassment and victimisation and promote equality of opportunity).	published. If interpretation services are required for support throughout the liaising with providers and if required during any signposting process, this will be offered on application and can be accessed using the following "How to book a BSL Interpreter or Translation" service.	the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist.

	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.		On application, the HSCP can make information available in both easy read versions and community languages on application.
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).	The ability to access quality services is a fundamental aspect in ensuring that older people enjoy a high quality of life. Research has demonstrated the need to involve individuals in the decision-making process underpinning service commissioning, service design and service delivery, whilst also ensuring those from across the protected characteristics are represented. It is important to be aware of potential impacts associated with age discrimination that leads to inequality in terms of access to services and user experience amongst different age groups, and the need to develop multi-dimensional approach to tackling inequality as a consequence of age discrimination. Throughout the development of the EqIA, reference has been	The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010). If requested East Dunbartonshire HSCP would consider to liaising with

1) Remove discrimination, harassment and	made to the general duties (Equality Act (2010) and to the HSCP	the providers and their clients to
victimisation	Equality Mainstreaming Report (2023-2027) Policy document	provide information/signposting onto
	 and how any proposed changes in service provision will meet	other services that may assist to
2) Promote equality of opportunity	the requirement;	mitigate if service adjustments
	'	transpire. For instance this could be
3) Foster good relations between protected	to eliminate unlawful discrimination	for the creation of a customer service
characteristics.	advance equality of opportunity, and;	leaflet signposting pathways for other
	 promote good relations 	services that may assist.
4) Not applicable	promote good relations	
	In relation to the requirement to show due regard to eliminate	On application, the HSCP can make
	unlawful discrimination, harassment and victimisation, the HSCP	information available in both easy
	is aware that people from our older communities may already be	read versions and community
	at increased risk of discrimination.	languages on application.
	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 additional	
	older people (aged 65 and over) in our society and proportionally	
	fewer children and people of working age.	
	Residents in East Dunbartonshire are living longer and the	
	average age when people move into sheltered housing has	
	steadily risen. A better range of choices is needed to enable	
	people to live fulfilling lives into older age. The size of the 65+	
	population is projected to grow significantly in East	
	Dunbartonshire over the next 15 years, driven mainly by life	
	expectancy. The projected increase is likely to increase demand	
	for social care in East Dunbartonshire.	
	Malos in East Dunhartanshira can aynost to live for 70.0 years	
	Males in East Dunbartonshire can expect to live for 79.9 years,	
	three years higher than the Scottish average	
	• Females can expect to live for 83.5 years, three years	
	higher than Scotland as a whole (National Records Scotland)	

		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. There will be a higher incidence of frailty, dementia and multi-morbities amongst this part of the population which suggests that demand for health and social care services will rise accordingly.	
(b)	Could the service design or policy content have a disproportionate impact on people due to the protected characteristic of disability? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation	Residents living in sheltered housing accommodation across Scotland has increased (2021-22). In Scotland the provision of local authority housing for older people increased by 10% for very sheltered properties and 5% for medium dependency properties in 2020-21, whilst the number of sheltered properties has decreased by 1%. The provision of housing for older people of which wheelchair adapted has increased by 2%. 18,000	The HSCP will actively consider identifying and removing any barriers to accessibility or inclusivity and aim to reduce inequality and inequity of outcomes. To further mitigate this we will continue to be committed to consider that for any future communication activity the specific needs and preferences of the communications audience including protected characteristic groups will be taken into account.
	Protected Characteristic	Service Evidence Provided	Possible negative impact and

			Additional Mitigating Action Required
(c)	Gender Reassignment Could the service change or policy have a disproportionate impact on people with the protected characteristic of Gender Reassignment?	NHSGG&C offer guidance on the health needs of transgender people and how to address discrimination against trans people in their <u>Briefing Paper on Gender Reassignment and Transgender</u> , as well as offering training for NHS staff on the subject of transgender people.	The HSCP will actively consider identifying and removing any barriers to accessibility or inclusivity and aim to reduce inequality and inequity of outcomes.
	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	In the 2022 Scotland's Census found that 19,990 people were trans, or had a trans history in Scotland. This is 0.44% of people aged 16 and over. To give an East Dunbartonshire context, this equates to 47 persons living in East Dunbartonshire. We have no specific data for figures relating to Transgender people who are residents in a sheltered housing unit.	The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010). If requested East Dunbartonshire HSCP would consider to liaising with
			the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist. On application, the HSCP can make information available in both easy read versions and community languages on application.

	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
(d)	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 (tick relevant boxes). 1) Remove discrimination, harassment and victimisation	The HSCP has no specific data for figures relating to Marriage and Civil Partnership, and who are residents in a sheltered housing unit. The number of marriages registered in East Dunbartonshire decreased between 2018 and 2020 and then increased in 2021 and 2022. This could potentially be due to COVID-19 restrictions. The 2011 Census question on marital status was extended from that asked in 2001 to include new categories for registered same-sex civil partnerships. 2022 Census data for marital status has not yet been released. 55% of East Dunbartonshire's population aged 16 and over were	The HSCP will actively consider identifying and removing any barriers to accessibility or inclusivity and aim to reduce inequality and inequity of outcomes. The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is
	3) Foster good relations between protected characteristics	married, this was 10% higher than Scotland as a whole. 28.2% of those aged 16 and over in East Dunbartonshire were single (never married or never registered a same-sex civil partnership).	any modifications to the services under the Equality Act (2010).
	4) Not applicable	All residents of East Dunbartonshire have the same rights in law as anyone else to marry, enter into a civil partnership or live together. Providing the person is over 16 years and has a general understanding of what it means to get married, he or she has the legal capacity to consent to marriage. No one else's consent is ever required. The District Registrar can refuse to authorise a marriage taking place if he or she believes one of the parties does not have the mental capacity to consent, but the level of learning disability has to be very high before the District Registrar will do so.	If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist. On application, the HSCP can make
			information available in both easy read versions and community

			languages on application.
(e)	Pregnancy and Maternity	The HSCP has no specific data for figures relating to pregnancy	The HSCP will actively consider
		and maternity, and who are residents in a sheltered housing unit.	identifying and removing any barriers
	Could the service change or policy have a		to accessibility or inclusivity and aim
	disproportionate impact on the people with the	Prevalence of low birth weight was at 1.16% (Scotland 2.02%),	to reduce inequality and inequity of
	protected characteristics of Pregnancy and Maternity?	prevalence of maternal smoking shows 6.45% (Scotland	outcomes.
		14.45%), and breast feeding rates at 6-8 weeks is 37.5%	
	Your evidence should show which of the 3 parts of the	(NHSGGC 26.4%).	The Providers are responsible for
	General Duty have been considered (tick relevant		managing any changes to their
	boxes).	In Scotland breastfeeding is protected by law, meaning it is an	budgets and engaging with tenants
		offence to stop someone from feeding their child, if under two,	regarding any related financial
	1) Remove discrimination, harassment	with milk, in a public place. Reasonable adjustments should be	impact. Should the provider choose
	victimisation	made for families/carers who visit sheltered housing units should	to withdraw or amend any current
	2) Drawata a miality of amountumity	they wish to breastfeed and consider to meet all reasonable	services or provision, the provider
	2) Promote equality of opportunity	requirements, for the purpose of supporting and encouraging the	should engage with their clients and
	3) Foster good relations between protected	breastfeeding of children by their mothers.	service users to mitigate if there is
	characteristics.		any modifications to the services
	Characteristics.		under the Equality Act (2010).
	4) Not applicable		
	4) Not applicable		If requested East Dunbartonshire
			HSCP would consider to liaising with
			the providers and their clients to
			provide information/signposting onto
			other services that may assist to
			mitigate if service adjustments
			transpire. For instance this could be
			for the creation of a customer service
			leaflet signposting pathways for other
			services that may assist.
			On application, the HSCP can make
			information available in both easy
			read versions and community
			languages on application.
	Protected Characteristic	Service Evidence Provided	Possible negative impact and

			Additional Mitigating Action Required
(f)	Race Could the service change or policy have a disproportionate impact on people with the protected characteristics of Race? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics 4) Not applicable	The HSCP has no specific data for figures relating to Race, and who are resident in a sheltered housing unit. Scotland's Census 2022 asked people to choose the option that best described their ethnic group or background. The majority of people in Scotland chose 'Scottish' (77.7%) or 'Other British' (9.4%) within the White category. In East Dunbartonshire, 83.4% of the population identified as 'Scottish' and 'Other British' (6.8%) within the White category. 4.3% of the population in East Dunbartonshire chose 'Asian, Asian Scottish or Asian British' that best described their ethnic group or background. East Dunbartonshire HSCP, has policies in place were staff, patients, service users can ask for alternative language formats for any health information, leaflet, poster etc. and it will be made available to all on request from members of staff.	Required The HSCP will actively consider identifying and removing any barriers to accessibility or inclusivity and aim to reduce inequality and inequity of outcomes. The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010). If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other
			leaflet signposting pathways for other services that may assist.
			transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other
			On application, the HSCP can make information available in both easy read versions and community languages on application.

(g)	Religion and Belief	In terms of the population of East Dunbartonshire and their	The HSCP will actively consider
		beliefs, the HSCP engage with a wide range of communities and	identifying and removing any barriers
	Could the service change or policy have a	people, who are representative of the overall population and	to accessibility or inclusivity and aim
	disproportionate impact on the people with the	there is little evidence to indicate specific faith groups fare more	to reduce inequality and inequity of
	protected characteristic of Religion and Belief?	poorly than others in terms of access to HSCP services.	outcomes.
	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.	The HSCP has no specific data for figures relating to Religion and belief, and who are resident in a sheltered housing unit. Scotland's Census 2022 reports that in East Dunbartonshire 47.7% of the population stated they belonged to a Christian denomination. In terms of the Christian denominations 23.4% of the population in East Dunbartonshire belonged to the Church of Scotland and 18.9% stated they were Roman Catholic. The 'Other Christian'	The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services
	Characteristics.	group accounted for 4.4% of the population.	under the Equality Act (2010).
	4) Not applicable	A large percentage of residents reported they had no religion (43.3%), though this is lower than the Scottish average of 51.1%. 1.3% reported that they were Muslim, 0.2% reporting other religions. NHSGG&C has a Faith and Belief Communities Manual which sets out its commitment to ensuring that spiritual care, including religious care, is provided in an equal and fair way to those of all faith communities and those of none. The manual is designed to help staff respond to religious care, and to be confident as they meet some of the religious needs of those in their care.	If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist. On application, the HSCP can make information available in both easy
			read versions and community languages on application.
	Protected Characteristic	Service Evidence Provided	Possible negative impact and Additional Mitigating Action

			Required
(h)	Sex Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sex? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation	The HSCP has no specific data for figures relating to Sex, and who are resident in a sheltered housing unit. Females represent a greater proportion of service users in all national statistics, (58% female to 42% male residents). The general trend may reflect that women live longer in East Dunbartonshire. As age increases, the ratio of women to men in the older population of East Dunbartonshire increases. The older population is expected to substantially increase by 25.9% over the ten years to 2028 in East Dunbartonshire and across all housing market areas nationally. A rapid movement	Required The HSCP will actively consider identifying and removing any barriers to accessibility or inclusivity and aim to reduce inequality and inequity of outcomes. The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current
	2) Promote equality of opportunity 3) Foster good relations between protected characteristics. 4) Not applicable	from 'Third Age' into a frail cohort is also on the horizon leading to increases in care, support and housing options.	services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010). If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist. On application, the HSCP can make information available in both easy read versions and community languages on application.
(i)	Sexual Orientation	The HSCP has no specific data for figures relating to Sex, and	The HSCP will actively consider

Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sexual Orientation? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes).	who are resident in a sheltered housing unit. The HSCP recognise that there is a potential deficit in the self-declaration of for residents in a sheltered housing unit, who identify themselves as from the LGBT community .This may be attributable to older LGBT community members often being reluctant to disclose this information.	identifying and removing any barriers to accessibility or inclusivity and aim to reduce inequality and inequity of outcomes. The Providers are responsible for managing any changes to their budgets and engaging with tenants
1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics.		regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010).
4) Not applicable		If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist.
		On application, the HSCP can make information available in both easy read versions and community languages on application.
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 <u>strategic</u> decisions. If relevant, you should evidence here what steps have been taken to assess and mitigate risk of exacerbating inequality on the ground of socioeconomic status. Additional information available here: <u>Fairer Scotland Duty: guidance for public bodies</u> <u>- gov.scot (www.gov.scot)</u>

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 socioeconomic disadvantage?
- 4. Are some communities of interest or communities of place more affected by disadvantage in this case than others?
- 5. What does our Duty assessment tell us about socio-

The HSCP has no specific data for figures relating to Socio – Economic Status & Social Class, and who are resident in a sheltered housing unit.

Sheltered housing provides a preventive service, reducing the need for more acute intervention later. Housing association management and HSCP support services in sheltered housing is targeted to assist people to live an active and fulfilling life. The benefits can be seen in the tenancy sustainment, maintenance of independence, the prevention of accidents and poor health, and improvements to physical and mental health. Sheltered housing can prolong independence and self-care by providing a range of low level support services, and supporting people to access more intensive services as and when they need them through referrals to the HSCP.

It is recognised that many of the sheltered housing residents maybe on a form of housing benefit or on low incomes. However, rent levels and service charges are not controlled or influence by the HSCP. The HSCP is not in a position to cap rents or service charges for the properties. The HSCP is willing to work with the housing associations to signpost residents if applicable to HSCP commissioned services, such as to income maximisation services where appropriate. A person's socioeconomic status will not make them any less safe and secure in their homes than anyone else, the HSCP will provide services when a person has been assessed as being needed.

The HSCP will actively consider identifying and removing any barriers to accessibility or inclusivity and aim to reduce inequality and inequity of outcomes.

The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010).

If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist.

On application, the HSCP can make information available in both easy read versions and community languages on application.

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

into the final decision.(k) Other marginalised groups

How have you considered the specific impact on other groups including homeless people, prisoners and exoffenders, ex-service personnel, people with addictions, people involved in prostitution, asylum seekers & refugees and travellers?

the 'Brown Principles' which can be used to

Those engaged with should also be advised

determine whether due regard has been given. When engaging with communities the National Standards for Community Engagement22 should be followed.

subsequently on how their contributions were factored

Poverty and fuel poverty is often a common denominator for protected characteristic groups most marginalised in society. To this end, digital exclusion will have the greatest impact on the frail/elderly, those with disabilities, transgender people and those from Black, Asian and/or ethnic minority communities. The HIT also commission, the Community Link Worker (CLW) service who work out of GP practices and they also signpost service users/patients to CAB for financial advice and income maximisation services.

The HSCP will actively consider identifying and removing any barriers to accessibility or inclusivity and aim to reduce inequality and inequity of outcomes.

The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010).

			If requested East Dunbartonshire HSCP would consider to liaising with the providers and their clients to provide information/signposting onto other services that may assist to mitigate if service adjustments transpire. For instance this could be for the creation of a customer service leaflet signposting pathways for other services that may assist. On application, the HSCP can make information available in both easy read versions and community languages on application.
8.	Does the service change or policy development include an element of cost savings? How have you managed this in a way that will not disproportionately impact on protected characteristic groups? Your evidence should show which of the 3 parts of the General Duty have been considered (tick relevant boxes). 1) Remove discrimination, harassment and victimisation 2) Promote equality of opportunity 3) Foster good relations between protected characteristics.	This proposal has the potential to have a significant negative impact on equality as the service is a financial review, which may impact some residents. This policy review is on a service which is not a statutory obligation. Any resident who has been assessed as having a need for social care and support will not be affected.	The Providers are responsible for managing any changes to their budgets and engaging with tenants regarding any related financial impact. Should the provider choose to withdraw or amend any current services or provision, the provider should engage with their clients and service users to mitigate if there is any modifications to the services under the Equality Act (2010).

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		Service Evidence Provided	Possible negative impact and Additional Mitigating Action Required
9.	What investment in learning has been made to prevent	Equalities Impact Assessor Training and staff development for	·
	discrimination, promote equality of opportunity and	all HSCP staff has been offered and was delivered to 14 HSCP	
	foster good relations between protected characteristic	staff members and we are further developing links with	
	groups? As a minimum include recorded completion	NHSGGC Equalities and Human Rights team to provide further	
	rates of statutory and mandatory learning programmes	training. This will provide a larger cohort of staff with the skill to	
	(or local equivalent) covering equality, diversity and	carry out an EqIA and advocate the importance of this across	
	human rights.	their staff teams.	

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.

Through the delivery of a coordinated EQIA programme for the policy/service review, the HSCP will ensure the right to protection from discrimination is upheld.

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*.

The PANEL principles and FAIR were used in the creation of the HSCP Strategic Plan (2022-25) to ensure that services and programmes take a human rights approach and were also used as part of this EQIA for the HSCP Housing Support Services policy review. This is to ensure that services and programmes also take a human rights-based approach with a focus on responding to and tackling inequality.

Participation- The HSCP actively engages with our service users, carers and stakeholders through direct engagement and evaluation with our Public, Service User and Carer group. For the creation of our Strategic Plan (2022-25) the HSCP split engagement into three phases from January 2021 to December 2022 and all subsequent policy reviews/service re-designs will follow a similar approach. The HSCP would routinely consult and engage with any people and carers who may be affected by a policy review. Due to extenuating, circumstances, those who may be affected could not be engaged with as they are not our direct clients through the service. The HSCP tried to go another route by engaging with those who may receive another direct service from us, again other assessed services are provided by additional commissioned providers such as a care at home service and telecare as detailed in Section 4.

Accountability- a detailed equalities assessment of our Strategic Plan (2022-25) was carried out and EqIAs for all associated service reviews and re-have also or will be undertaken. These will be reviewed on a six monthly basis to further monitor and actively mitigate if there are is anyone unduly affected.

Non-discrimination – The HSCP Strategic Plan (2022-25) is a document that gives a strategic planning direction and aims to provide health and care services which are open to all.

Equality/Empowerment- The Strategic Plan (2022-25) and all associated service reviews or service re-designs seeks to promote equality and equity across East Dunbartonshire. The HSCP will continue to commission and utilise research reports to raise awareness, plan, resource and act on the significant health inequality challenges for the IJB. We have introduced and will embed patient and public involvement via the Public, Service User and Carer (PSUC) group.

Legality-The service is compliant with UK and Scottish Law.

Article 8 protects your right to respect for your private and family life

No specific or definable approach was applied in the development of the policy review, 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.

•	npleted the EQIA template, please tick which option you (Lead Reviewer) perceive best reflects the findings of the assessment. This can be cross-checked via 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.

East Dunbartonshire Health and Social Care Partnership (HSCP) is committed to having robust arrangements to support meaningful public, carer, patient, service user and stakeholder involvement. The HSCP and its teams regularly devise and implement a range of engagement, participation and community involvement programmes aimed at different stakeholders. The PSUC group asked their support officer to gather PoA figures for East Dunbartonshire. This was in response to a presentation the group received from Stephen McDonald (Joint Service Manager, Older People) on the challenges that the HSCP face when residents are hospitalised without capacity and do not have a PoA in place to look after their wishes and financial affairs. The PSUC group with the assistance of the HSCP officer, then embarked on a promotional campaign to communicate the benefits of having a PoA to all residents and communities in East Dunbartonshire. In May 2020, the Office of Public Guardian (OPG) confirmed there were 21,926 registered PoA's from East Dunbartonshire. By the end of the three year programme (July 2023), there were 26,846 registered PoA's from East Dunbartonshire, this is an increase of 22.5% compared to 2020. (The OPG have a 12 month backlog in registrations). The equalities and human rights benefits provided by this programme is a challenge to quantify, albeit the evaluation has shown that local people have an increased knowledge to the benefits of PoA and that their choices and rights will be respected in the event of incapacity.

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)
As described, the HSCP is willing to engage with providers to signpost, or support access to commissioned services if there is any mitigation required that may ensure any groups with a protected characteristic or from a marginalised group so that no one is unduly affected.	01/02/2025 GH (Gillia	nn Healey)

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

01/02/2025

Lead Reviewer:

EQIA Sign Off:

Name

Job Title

Signature

Anthony Craig

Development Officer

Anthony Craig

Date 25/07/2024

Quality Assurance Sign Off: Name Alastair Low

Job Title Planning Manager Signature Alastair Low

Date 26/07/24



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:

	Cor	npleted
	Date	Initial
Action:		
Status:		
Action:		
Status:		
Action:		
Status:		
Action:		
Status:		
Status: Please detail any outstanding activity with regard to required reason for non-completion		
Please detail any outstanding activity with regard to required	To be Co	ompleted by
Please detail any outstanding activity with regard to required reason for non-completion		
Please detail any outstanding activity with regard to required reason for non-completion Action:	To be Co	ompleted by
Please detail any outstanding activity with regard to required	To be Co	ompleted by

Please deta	il any new actions required since completing the original EQIA and reasons:		
		To be completed by	
		Date	Initials
Action:			
Reason:			
Action:			
Reason:			
Please detail any discontinued actions that were originally planned and reasons:			
Action:			
Reason:			
Action:			
Reason:			
Please write your next 6-month review date			
Name of completing officer:			
Date submitted:			
If you would like to have your 6 month report reviewed by a Quality Assuror please e-mail to: alastair.low@ggc.scot.nhs.uk			