

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:

Maternal And Infant Nutrition Review

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

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

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

The MINF review is essentially a stocktaking exercise across maternal and infant feeding developments within NHSGG. The review provides insight into current arrangements; level of impact and areas where future improvements may be secured based on the development of clear strategic outcomes and evidence informed practice.

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.)

Maternal and Infant Nutrition was identified as a priority programme in the Public Health Strategy 2018 and the review was undertaken as a corporate objective 2018/19.

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:
Anna Baxendale

Date of Lead Reviewer Training:

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):

High level policy EQIA only

	Lead Reviewer Question	Example	Service Evidence Provided	Additional Requirements
1.	<p>What equalities information is routinely collected from people using the service or affected by the policy? Please note any barriers to collecting this data in your submitted evidence and an explanation for any protected characteristic data omitted.</p>	<p><i>A sexual health service collects service user data covering all 9 protected characteristics.</i></p>	<p>The review utilises existing data sources routinely used to describe aspects of MIN at population level.</p> <p>Data is limited with regard to protected characteristic however when available this has been considered.</p>	<p>Further analysis of patterning captured by protected characteristic requires data linkage however this should be explored.</p> <p>Ways of improving data collection by services and using this to evaluate MIN programmes should be kept under review.</p>
	Lead Reviewer Question	Example	Service Evidence Provided	Additional Requirements
2.	<p>Please provide details of changes to the service or Policy or how they have been informed as a result of collecting routine data.</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p>	<p><i>A physical activity programme for people with long term conditions reviewed service user data and found very low attendance by BME (Black and Minority Ethnic) people. Engagement activity with BME people found promotional material for the interventions was not inclusive, using mainly</i></p>	<p>Information available provides a degree of understanding/correlation between deprivation and MIN and provides insight into the targeted approaches required within specific areas to actively address socio-economic inequalities.</p> <p>Areas where some evidence exists (nationally) suggests a targeted approach is required e.g. South Asian communities has been considered.</p>	<p>Further data and community engagement is required to inform programme design on the grounds of experienced deficit and need in key groups.</p> <p>Programme design should include consideration of disaggregated data collection where possible.</p>

	<p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity ✓ <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p>	<p><i>stock images of white people in gyms. As a result an adapted range of materials were used with ongoing monitoring of uptake.</i></p>		
	Lead Reviewer Question	Example	Service Evidence Provided	Additional Requirements
3.	<p>How have you applied learning from research evidence about the experience of equality groups to the service or Policy?</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity ✓ <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p>	<p><i>Looked after and accommodated care services reviewed a range of research evidence to help promote a more inclusive care environment. Research suggested that young LGBT+ people had a disproportionately difficult time through exposure to bullying and harassment. As a result staff were trained in LGBT+ issues and were more confident in asking related questions to young people.</i></p>	<p>The review is a high level document that has been based on evidence returned from a range of research sources and available data.</p> <p>Going forward recommendations with scope to impact on inequalities will be require to be informed by community engagement and consideration of protected characteristics</p> <p>e.g. developing an infant feeding plan to deliver person centred care will require the consideration of communication requirements and removal of cultural barriers.</p> <p>e.g. future community based breastfeeding support will be informed by undertaking action research with BME and Polish communities</p> <p>e.g. Post partum weight management pathways for mothers with Gestational Diabetes or at risk of Diabetes will reduce known barriers to access by providing opt out arrangements and support to promote attendance</p>	
	Lead Reviewer Question	Example	Service Evidence Provided	Additional Requirements

4.	<p>Can you give details of how you have engaged with equality groups with regard to the service review or policy development? What did this engagement tell you about user experience and how was this information used?</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity ✓ <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p>	<p><i>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.</i></p> <p><i>* The Child Poverty (Scotland) Act 2017 requires organisations to take actions to reduce poverty for children in households at risk of low incomes.</i></p>	<p>User engagement was out-with the scope of this review however opportunities to undertake engagement have been identified. E.g. Routine maternal audit should include groups with protected characteristics</p> <p>E.g. Additional engagement should be secured to ensure needs of protected groups are met through routine services / inform programme design</p>	<p>Engagement with protected characteristic groups should form part of the ongoing development</p>
	Lead Reviewer Question	Example	Service Evidence Provided	Additional Requirements
5.	<p>Is your service physically accessible to everyone? If this is a policy that impacts on movement of service users through areas are there potential barriers that need to be addressed?</p>	<p><i>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</i></p>		<p>Access barriers require to be considered in relation to programme /service areas</p>

	<p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p>	<p><i>have the doors retained by magnets that could deactivate in the event of a fire.</i></p>		
	<p>Lead Reviewer Questions</p>	<p><i>Example</i></p>	<p>Service Evidence Provided</p>	<p>Additional Requirements</p>
<p>6.</p>	<p>How will the service review or policy development ensure it does not discriminate in the way communicates with service users and staff?</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of</p>	<p><i>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.</i></p> <p><i>Written materials were offered in other languages and formats.</i></p>	<p>Delivering clear and accessible communication is a core responsibility of NHSGGC. Proposed workstreams require to consider accessible and appropriate services as part of programme design in line with NHSGGC's equality mainstreaming commitments including:</p> <ul style="list-style-type: none"> • Clear to All Accessible Information Policy • Interpreting and Communication Support Policy • British Sign Language (BSL) Act 2015 	

	<p>opportunity</p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p> <p>The British Sign Language (Scotland) Act 2017 aims to raise awareness of British Sign Language and improve access to services for those using the language. Specific attention should be paid in your evidence to show how the service review or policy has taken note of this.</p>			
7	Protected Characteristic	Service Evidence Provided	Additional Requirements	
(a)	<p>Age</p> <p>Could the service design or policy content have a disproportionate impact on people due to differences in age? Consider any age cut-offs that exist in the service design or policy content. You will need to objectively justify in the evidence section any segregation on the grounds of age promoted by the policy or included in the service design.</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p>	<p>The review considers specific stages of the life course and understands this will be achieved by taking a person-centred and inequality sensitive approach to service design and delivery.</p>		

	<p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p>		
(b)	<p>Disability</p> <p>Could the service design or policy content have a disproportionate impact on people due to the protected characteristic of disability? What opportunities have been explored to make appropriate reasonable adjustments?</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity ✓ <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p>	<p>There is no specific risk identified that disabled people may experience differential deficit, however no data was available at this stage of the review.</p>	<p>Workstreams / programme design will consider disability requirements where relevant.</p>
	Protected Characteristic	Service Evidence Provided	Additional Requirements
(c)	<p>Gender Identity</p> <p>Could the service change or policy have a disproportionate impact on people with the protected characteristic of gender identity?</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p>	<p>The review considers specific stages of the reproductive life course and understands this will be achieved by taking a person-centred and inequality sensitive approach to service design and delivery which includes consideration of partner/ families.</p>	

	<p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p>		
	Protected Characteristic	Service Evidence Provided	Additional Requirements
(d)	<p>Marriage and Civil Partnership</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Marriage and Civil Partnership?</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p>	<p>The review considers specific stages of the reproductive life course and understands this will be achieved by taking a person-centred and inequality sensitive approach to service design and delivery which includes consideration of partner/ families.</p>	
(e)	<p>Pregnancy and Maternity</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristics of Pregnancy and Maternity?</p>	<p>The review directly considers antenatal and postnatal stages of the reproductive life course and understands this will be achieved by taking a person-centred and inequality sensitive approach to service design and delivery which includes consideration of partner/ families.</p>	

	<p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p>		
	Protected Characteristic	Service Evidence Provided	Additional Requirements
(f)	<p>Race</p> <p>Could the service change or policy have a disproportionate impact on people with the protected characteristics of Race?</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation ✓ <input type="checkbox"/></p> <p>2) Promote equality of opportunity ✓ <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics <input type="checkbox"/></p>	<p>The review recognises that the data available relating to race is limited and further analysis should inform programme development in the future.</p> <p>The review promotes practice that is fully accessible such as the use of appropriate communication support including use of interpreting and translation services.</p>	<p>Undertake community engagement / qualitative research to inform programme design/interventions</p>
(g)	<p>Religion and Belief</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Religion and Belief?</p> <p>Your evidence should show due regard to meeting the</p>	<p>There is no scope in the review to have a disproportionate differential impact on the grounds of Religion and Belief</p>	

	<p>3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p>		
	Protected Characteristic	Service Evidence Provided	Additional Requirements
(h)	<p>Sex</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Sex?</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p>	<p>The review considers impact on the grounds of Sex based on the female role as mother. The review outlines a number of opportunities to provide support for mothers in their role in the context of person centred care.</p>	
(i)	<p>Sexual Orientation</p> <p>Could the service change or policy have a disproportionate impact on the people with the protected characteristic of Religion and Belief?</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been</p>	<p>The review considers specific stages of the reproductive life course and understands this will be achieved by taking a person-centred and inequality sensitive approach to service design and delivery which includes consideration of partner/ families. No differential impact of sexual orientation is identified.</p>	

	<p>included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and victimisation <input type="checkbox"/></p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p>		
	Protected Characteristic	Service Evidence Provided	Additional Requirements
(j)	<p>Socio – Economic Status & Social Class</p> <p>Could the service change or policy have a disproportionate impact on the people because of their social class or experience of poverty and what mitigating action have you taken/planned?</p>	<p>The review considers a number of aspects of socio-economic status or social class. One of the main goals of the review workstreams will be to consider the impact of deprivation of programme design.</p>	
(j)	<p>Other marginalised groups</p> <p>How have you considered the impact on other groups including homeless people, prisoners and ex-offenders, ex-service personnel, people with addictions, asylum seekers & refugees and travellers?</p>		
8.	<p>Does the service change or policy development include an element of cost savings? How have you managed this in a way that will not disproportionately impact on protected characteristic groups?</p> <p>Your evidence should show due regard to meeting the 3 parts of the General Duty. Tick all that have been included in your evidence (at least one required).</p> <p>1) Remove discrimination, harassment and</p>	<p>The review is not a response to cost savings measures but should inform a more effective use of resources.</p>	



	<p>victimisation</p> <p>2) Promote equality of opportunity <input type="checkbox"/></p> <p>3) Foster good relations between protected characteristics. <input type="checkbox"/></p> <p>*The Fairer Scotland Duty (2018) places a legal responsibility on public bodies in Scotland to actively consider how they can reduce inequalities of outcome caused by socioeconomic disadvantage in strategic planning.</p>		
	Lead Reviewer Question	Service Evidence Provided	Additional Requirements
9.	<p>What investment in learning has been made for staff to help prevent discrimination, promote equality of opportunity and foster good relations between protected characteristic groups? As a minimum this should include recorded completion rates of statutory and mandatory learning programmes covering equality, diversity and human rights.</p>	<p>NHSGGC statutory and mandatory Equality and Human Rights learning package.</p>	

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.

The strategy will not act in a way that could impact on the human rights of patients, service users or staff. Rather, the strategy embraces a rights-based approach to improving the quality of service provision in NHS GGC.

Please explain in the field below any human rights based approaches undertaken to better understand rights and responsibilities resulting from the service or policy development and what measures have been taken as a result e.g. applying the PANEL Principles to maximise Participation, Accountability, Non-discrimination and Equality, Empowerment and Legality or FAIR* .

- *Facts: What is the experience of the individuals involved and what are the important facts to understand?
- Analyse rights: Develop an analysis of the human rights at stake
- Identify responsibilities: Identify what needs to be done and who is responsible for doing it
- Review actions: Make recommendations for action and later recall and evaluate what has happened as a result.

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

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

Date for completion	Who is responsible?(initials)

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

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Lead Reviewer:

Name

EQIA Sign Off:

Job Title

Signature

Date

Quality Assurance Sign Off:

Name

Job Title

Signature

Date

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

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

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Please detail activity undertaken with regard to actions highlighted in the original EQIA for this Service/Policy

		Completed	
		Date	Initials
Action:			
Status:			
Action:			
Status:			
Action:			
Status:			
Action:			
Status:			

Please detail any outstanding activity with regard to required actions highlighted in the original EQIA process for this Service/Policy and reason for non-completion

		To be Completed by	
		Date	Initials
Action:			
Reason:			
Action:			
Reason:			

Please detail any new actions required since completing the original EQIA and reasons:

		To be completed by	
		Date	Initials
Action:			
Reason:			
Action:			
Reason:			

Please detail any discontinued actions that were originally planned and reasons:

Action:	
Reason:	
Action:	
Reason:	

Please write your next 6-month review date

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Name of completing officer:

Date submitted:

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