

Equality Impact Assessment Tool: Policy, Strategy and Plans

(Please follow the EQIA guidance in completing this form)

1. Name of Strategy, Policy or Plan

INVERCLYDE Community Health and Care Partnership (CHCP) Health and Homelessness Action Plan (HHAP) (and in particular: Homeless Service User Consultation and Involvement). The HHAP adheres to the Equality Act 2010 as each Service, working together to deliver the HHAP, monitors all of the Protected Characteristics set out within the Equality Act to ensure that the needs of service users are recognised and addressed through person-centred, holistic assessment.

Please tick box to indicate if this is: **Current Policy, Strategy or Plan** **New Policy, Strategy or Plan**

2. Brief Description – Purpose of the policy; Changes and outcomes; services or activities affected

The Inverclyde CHCP Health and Homelessness Action Plan:

- (a)** Provides a tool for the Self-Assessment and subsequent Independent Assessment of Health Service Access for persons affected by Homelessness;
- (b)** Provides a Framework for New Actions (based on the previous year's Independent Assessment) designed to Improve Service Access for Persons affected by Homelessness;
- (c)** Provides a tool for the setting of Actions for, and Assessment of, Health Improvement Activities for persons affected by homelessness.

The HHAP highlights Service User Consultation and Involvement as a priority on-going Action. It is a Board and Scotland-Wide Assessment and Planning Tool created to implement the then Scottish Executive's Health and Homelessness Standards for NHS Boards, launched on 3rd March 2005, as detailed within points 1 – 6 below. The Standards remain at the centre of the Scottish Government's commitment to improve the health of homeless people, and to contribute significantly to addressing the health consequences of inequality. Whilst NHS Boards hold strategic responsibility for the Standards, delivery in the main is through CH(C)Ps. The Standards also sit within the broader holistic framework to prevent and alleviate homelessness through partnerships which support complementary work across CH(C)Ps, Local Authorities and the Voluntary Sector.

1. The Board's governance systems provide a framework in which improved health outcomes for homeless people are planned, delivered and sustained. The objective of this Standard is to enable NHS Boards to demonstrate corporate buy-in and support for the policy, and to ensure that implementation is being driven at senior management level.

2. The Board takes an active role, in partnership with relevant agencies, to prevent and alleviate homelessness. The objective of this Standard is to demonstrate that NHS Boards are working with, and learning from, those agencies that also have important roles in the lives of homeless people.

3. The Board demonstrates an understanding of the profile and health needs of homeless people across the area. The objective of this Standard is for NHS Boards to develop and maintain an evolving body of knowledge of health and homelessness. This knowledge will help to ensure that services evolve in ways which will be most responsive to the health needs of homeless people, which may change over time.

4. The Board takes action to ensure homeless people have equitable access to the full range of health services. The objective of this Standard is to break down the barriers which prevent homeless people from having their health needs met. Barriers may be structural, policy based or attitudinal.

5. The Board's services respond positively to the health needs of homeless people. The object of this Standard is to assist NHS Boards to understand the ways in which services can operate with the greatest positive impact on the health of homeless people.

6. The Board is effectively implementing the Health and Homelessness Action Plan. The objective of this Standard is to formalise the ongoing use of Health and Homelessness Action Plans as the main planning tool for local health and homelessness activity.

3 Lead Reviewer

Ann Drennan, Health, Homelessness and Housing Lead, Inverclyde CHCP.

4. Please list all participants in carrying out this EQIA:

Ann Drennan, Health, Homelessness and Housing Lead, Inverclyde CHCP
 Martin Murray, Community Nurse for Homeless Persons, Homelessness Service, Inverclyde CHCP
 Sara MacLean, Health Improvement Practitioner for Adults and Older People Team, Inverclyde CHCP
 Frances Bryce, Health Improvement Senior for Adults and Older People Team, Inverclyde CHCP
 Alice Paul, Senior Development Officer, Your Voice, Inverclyde Community Care Forum
 Eileen Tamburrini, Service Manager, Assessment, Support and Homelessness Service, Inverclyde CHCP

5. Impact Assessment

A Does the policy explicitly promote equality of opportunity and anti-discrimination and refer to legislative and policy drivers in relation to Equality

The whole ethos of the Health and Homelessness Action Plan (HHAP) is to ensure that Persons Affected by Homelessness (PAH); and Persons Threatened with Homelessness are not disadvantaged when accessing mainstream health services, ie, they do not experience difficulties in accessing health services. The HHAP references published research in the field of Public Health which demonstrates the difficulties faced by PAH when trying to access mainstream health services, and highlights an over-dependence on Accident and Emergency Services¹. It also makes reference to the understanding gained from further research which indicates a higher mortality rate for Homeless Persons in comparison to the rest of the population².

Each of the 6 Health and Homelessness Standards are promoted and implemented through the partnership of Health Services, the Local Authority and the Voluntary Sector within a person-centric, rather than service-centric model of care. An example of this model is recognised through no person being excluded from services owing to their alcohol or drug addiction.

The HHAP's implementation is assisted greatly by the work of the **Inverclyde Community Care Forum (Your Voice)**. Your Voice has, since the inception of Inverclyde CHCP's Advisory Group (April 2012), greatly contributed to Service User Consultation and Involvement across the Statute, Voluntary and Housing Sectors within Inverclyde. The creation of the 11 Sub-Groups: *Long Term Conditions and Self Care; Older People; Homelessness and Housing; Secondary Care (including Hospital Discharge and Palliative/End of Life Care); Addictions; Carers; Disability (including Physical and Learning); Mental Health and Well-Being (including Dementia); Children and Young People; Healthier Lifestyles and Health Inequalities; and Adult Protection* has provided the CHCP with a mechanism through which the voices of Inverclyde's people are heard by Service Managers, offering an opportunity to improve the accessibility and delivery of services based on the needs of service users and carers. This a mechanism which is worth replicating within other CH(C)Ps across Greater Glasgow and Clyde, and across the NHS in Scotland.

¹ A Needs Assessment, Extent, Nature, and Causes of Homelessness in Glasgow. Dr David S Morrison, Consultant in Public Health (August 2003).

² Homelessness as an Independent Risk Factor in Mortality: Copyright: Dr David Morrison, 2009; all rights reserved.

B What is known about the issues for different equalities groups in relation to the services or activities affected by the policy?		
		Source
All	<p>The equalities groups affected by this Plan include persons who are homeless, are affected by homelessness or are threatened with homelessness. They may also suffer a disability, mental ill-health or addiction issue, or other issue which can cause them to have more difficulty than the general population when trying go access health services. Equality Monitoring of all Protected Characteristics is carried out when a person receives a Housing Options Assessment or makes a Homelessness Application. The question: <i>Prefer not to answer</i> is included against all Protected Characteristics. Housing Options Assessments/Advice Cases and Homelessness Applications have an Equality Monitoring form attached which is used for the purposes of ensuring compliance with the requirements of the Data Protection Act 1988, and is collected in order to eliminate discrimination, advance equality, and to foster good relations across a range of protected characteristics. The personal information contained therein is not shared and is treated in strict confidence, and names will not be reported or published in any way that makes it possible for individuals to be identified. Furthermore, NHSGGC produces Equality Monitoring Reports which ensures that the Services which support and deliver the HHAP are supported by a diverse workforce. The Local Authority also monitors the diversity of its workforce.</p> <p>In Inverclyde, there is a prevalence of White Scottish service users. The HHAP is designed to accommodate the needs of all ethnicities, and to meet the expectations of the Protected Characteristics. This is delivered through person-centred, holistic assessment and care designed to meet each individual's own specific needs. Any service user who advises of being aligned to any of the Protected Characteristics will be assisted by each service delivering the HHAP with discretion and flexibility, and with due care and attention given to their specific needs to ensure that they do not suffer any discrimination or distress. An example of flexibility is the current provision of assistance to service users to attend at a service; or to bring a service to a service user's current accommodation, and to support them at their service appointments through prior provision of, eg, an information sheet which can be used by service users to identify their own language, and for an interpreter to be arranged to be in attendance at their appointment.</p>	Inverclyde Council AVD Database.

	Information as to Sex is requested in relation to all persons who are subject to a Housing Options Assessment /Advice Case or a Homelessness Application. Of those applicants who subsequently go on to attend the Community Nurse for Homeless People and/or participate in the Homelessness Service’s Health Advice Talks on Alcohol and Drugs (HAD-IT), Sex Data Collection has already taken place. There has been no adverse effect on a person’s Housing Options Assessment/Advice Case or Homelessness Application owing to their Sex. There is no evidence to suggest that either Sex suffers any discrimination based on their Sex, and no evidence to suggest that either Sex experiences a better outcome to their Housing Options Assessment/Advice Case or Homelessness Application; or receives a more comprehensive health assessment or treatment owing to their Sex (homeless clients have access to the Community Nurse for Homeless People, the Senior Alcohol Counsellor and the Drugs Outreach Worker).	Inverclyde Council AVD Database.
Gender Reassignment	Information on Gender Reassignment is requested in relation to persons who are subject to a Housing Options Assessment/Advice Case or a Homelessness Application. A person-centred holistic assessment of need ensures that any service user who makes known their Gender Reassignment status is offered appropriate accommodation in line with their needs. All homeless service users are provided with their own self-contained accommodation which ensures that there is no discrimination relating to the provision of accommodation, and that the privacy of service users is assured.	As Above.
Race	Information on Race is requested in relation to all persons who are subject to a Housing Options Assessment Assessment/Advice Case or a Homelessness Application. As detailed above, all service users receive a person-centred holistic assessment of their needs to ensure that they do not suffer discrimination.	As Above.
Disability	Information on Disability is requested in relation to all persons who are subject to a Housing Options/Advice Case or an Homelessness Application. As detailed above, all service users receive a person-centred holistic assessment of their needs to ensure that they do not suffer discrimination. Section E2 contains a related Action.	As Above.
Sexual Orientation	Information on Sexual Orientation is requested in relation to all persons who are subject to a Housing Options/Advice Case or a Homelessness Application. As detailed above, all service users receive a person-centred holistic assessment of their needs to ensure that they do not suffer discrimination.	As Above.

Religion and Belief	Information on Religion and Belief is requested in relation to all persons who are subject to a Housing Options Assessment/Advice Case or a Homelessness Application. As detailed above, all service users receive a person-centred holistic assessment of their needs to ensure that they do not suffer discrimination.	Inverclyde Council AVD Database.
Age	Information on Age is requested in relation to all persons who are subject to a Housing Options Assessment/Advice Case or a Homelessness Application. Information on Age is necessary in relation to a person's Date of Birth as on making a Statute Homelessness Application, an income/benefits' check is necessary to support the investigation of the Application, and to support the charging and collection of rent for the provision of temporary homelessness and/or homelessness supported accommodation. The personal information contained within these Applications is shared on a need-to-know basis, especially in relation to the application for Housing Benefit.	As Above.
Pregnancy and Maternity	Information on Pregnancy and Maternity is requested in relation to all persons who are subject to a Housing Options Assessment/Advice Case or a Homelessness Application. Pregnant service users are offered a referral to the Special Needs In Pregnancy Service (SNIPS). This is a service used mainly for pregnant females who have drug and/or alcohol issues, but is also open to any pregnant female with a special need, such as homelessness or mental illness.	As Above.
Marriage and Civil Partnership	Information on Marriage and Civil Partnership is requested in relation to all persons who are subject to a Housing Options Assessment/Advice Case or a Homelessness Application. All homeless service users are provided with their own self-contained accommodation which ensures that there is no discrimination relating to the provision of accommodation, and that the privacy of service users is assured. If service users are married or are in a Civil Partnership, they are provided with accommodation for a couple, and not accommodated separately.	As Above.
Social and Economic Status	Information on Social and Economic Status is requested in relation to all persons who are subject to a Housing Options Assessment/Advice Case or a Homelessness Application. An Income Maximisation Service is provided to all applicants who request it; and also to those applicants whom the Housing Options/Advice and Homelessness Service believe would benefit from it. This is an important Service which helps service users to receive their full benefit and other financial entitlements. Service users' employment needs are also reviewed in order that they can consider moving into employment when they secure stable accommodation. Section E2 contains a related Action.	As Above

<p>Other marginalised groups (prisoners, homelessness, addictions, travellers, asylum seekers and refugees etc)</p>	<p>The HHAP focuses on ensuring that Persons affected by Homelessness, or in Threat of Homelessness, are not marginalised, and ensures the continuity of health and social care for Prisoners on Release, those with an addiction issue and/or mental ill-health; travellers and refugees.</p> <p>Prisons are visited regularly by Assessment and Support officers to start prisoners' Housing Options Assessments/Advice Cases or Homelessness Applications before release to ensure that prisoners have accommodation (various tenures) available on release.</p> <p>Based at the Housing Options/Advice and Homelessness Service premises at the Inverclyde Homelessness Centre, and included within the Homelessness Service is the Homelessness Health Team, comprising of the Community Nurse for Homeless People, a Senior Alcohol Counsellor and a Drugs Outreach Worker. All clients of the Service are offered an initial general health assessment and, if appropriate, an initial mental health assessment, both carried out by the Community Nurse for Homeless People. Service users are also offered an Alcohol Brief Intervention and are made aware of the drug service. Referral Pathways to the Community Nurse for Homeless People (a General and Mental Health Registered Nurse), the Senior Alcohol Counsellor and to the Drugs Worker are reviewed annually. Referral numbers are monitored and any incidences of a lower than expected number of Referrals being made is examined for any underlying cause. Referral numbers are reported quarterly via the Homelessness Prevention and Health Improvement Performance Framework. The Homelessness Health Team is an in-house Health Service which greatly supports homeless service users who are living in temporary accommodation, and who may no longer be engaging with mainstream health services. The Health Team provides direct access to health services for homeless service users who often have complex health and care needs.</p>	<p>As Above.</p>
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C Do you expect the policy to have any positive impact on equalities or on different equalities groups?			
	Highly Likely	Probable	Possible
General	<p>Yes, the HHAP is an Action Plan which aims to improve access to health services for the different equalities groups which can include persons affected by homelessness.</p> <p>The HHAP is a Plan designed to improve the lives of persons affected by homelessness in a holistic way; to improve access to health and social care services. The results of annual Homeless Service User Consultation Exercises are examined and where service access difficulties have been identified, they are addressed through awareness-raising within staff groups, and by improving referral pathways into services. Referral pathways are constantly monitored and reported on quarterly within the CHCP, and quarterly to NHSGGC.</p> <p>The CHCP Development Plan 2010/13, and the Inequalities Framework included within, reflect</p>		

	<p>the needs of marginalised groups, and reduce the risk of unequal health outcomes. The CHCP Development Plan and the Local Authority's Homelessness Strategy cross-reference health and homeless issues, and the CHCP is enabled to deliver the Scottish Government's Health and Homelessness Standards through partnership-working and the sharing of good practice.</p> <p>All Services delivering the HHAP have received Awareness-Raising in relation to the Protected Characteristics, with further Awareness-Raising Sessions planned for mid 2013.</p>		
<p>Sex</p>	<p>The Actions within the HHAP are designed to positively impact on both Sexes as each service user within each service delivering the HHAP is provided with an holistic, person-centred assessment and care package. Males and Females are provided with their own self-contained accommodation and, if they wish to speak with a member of staff of their own sex, this is arranged.</p>		

<p>Gender Reassignment</p>	<p>The Actions within the HHAP are designed to positively impact on persons who are trans-gender or are in transition as any service user who discloses that they fall into this Protected Characteristic will be offered a discrete, person-centred assessment of their care and needs. Further awareness-raising in relation to Gender Reassignment is planned for mid 2013.</p>		
<p>Race</p>	<p>The Actions within the HHAP are designed to positively impact on persons of all races with due care and attention taken by all service staff to the needs of all service users of all Races. Each service user is offered an holistic service and no service user is discriminated against owing to their Race.</p>		
<p>Disability</p>	<p>Overall, the Actions within the HHAP are designed to positively impact on persons who have a Disability. The HHAP advises that the Inverclyde Health and Homelessness Action Group (HHAG) will continue to work towards ensuring equality of access to all services (Health and</p>	<p>The Actions within the HHAP are designed to positively impact on persons who have a Disability however, consideration to improving access to the Inverclyde Homelessness Centre will be addressed (see Section E2 below).</p>	

	Social Care). This Action includes addressing the needs of Disabled Persons.		
Sexual Orientation	The Actions within the HHAP are designed to positively impact on persons of any Sexual Orientation through the provision of self-contained homelessness accommodation and through an in-house Homelessness Health Team.		
Religion and Belief	The Actions within the HHAP are designed to positively impact on persons of any Religion and Belief as the HHAP makes no adverse distinction between the religious beliefs of service users.	An Action has been inserted at E2 as it is recognised that a review of information in relation to Religion and Belief is required to be carried out to ensure that there is sufficient information available to service users, eg, location of places of worship.	
Age	The Actions within the HHAP are designed to positively impact on persons of any age as there are no age barriers to accessing health services, and no upper age limit in relation to receiving assistance when homeless, or to prevent homelessness.		
Marriage and Civil Partnership	The Actions within the HHAP are designed to positively impact on persons who are married or who are in a Civil Partnership as each service delivering the HHAP uses		

	<p>information received in relation to Marriage and Civil Partnership to support service users, and within the Inverclyde Homelessness Centre, accommodation is provided for homeless couples, as well as for single persons.</p>		
<p>Pregnancy and Maternity</p>	<p>The Actions within the HHAP are designed to positively impact on pregnant females, and mothers with children in their care; equally as on fathers with children in their care.</p> <p>Homeless service users who are fathers with children in their care are provided with the same service as homeless service users who are mothers with children in their care, ie, they are provided with an holistic homelessness assessment of their housing needs and offered an holistic assessment of their health needs.</p> <p>Pregnant service users are provided with information on their care needs via a referral to the Special Needs In Pregnancy Service (SNIPS). This is a service used mainly for pregnant females who have drug and/or alcohol issues, but is also open to any</p>		

	<p>pregnant female with a special need, such as homelessness or mental illness.</p> <p>All homeless households who have dependant children are referred to the Health Visitor Service to ensure that they are linked into that Service, especially as their addresses change.</p>		
Social and Economic Status		<p>The Actions within the HHAP are designed to positively impact on a person's Social and Economic Status. This is an area which is currently being pro-actively progressed by the Health Improvement Practitioner, Inverclyde CHCP (see also E2 below).</p>	
Other marginalised groups (prisoners, homelessness, addictions, travellers, asylum seekers and refugees etc)	<p>The Actions within the HHAP are designed to positively impact on all marginalised groups. The Plan has, and will continue to have, a positive impact on Prisoners on Release, those with an addiction issue and/or mental ill-health; travellers and refugees. This positive impact comes, and will continue to come from the monitoring of Referral Pathways which highlights any gaps and blockages in service provision.</p>		

	The Senior Health Visitor from Port Glasgow Health Centre visits Gypsy Travellers when they arrive at Newark, and invites them to attend at Port Glasgow Health Centre.		
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D Do you expect the policy to have any negative impact on equalities or on different equalities groups?			
	Highly Likely	Probable	Possible
General	NO	NO	NO
Sex	NO	NO	NO
Gender Reassignment	NO	NO	NO
Race	NO	NO	NO
Disability	NO	A review of facilities within the Inverclyde Homelessness Centre in relation to clients with a disability or long-term condition will be undertaken to ensure easy access to, and within, the Centre. (see Action within E2 below).	NO
Sexual Orientation	NO	NO	NO
Religion and Belief	NO	NO	NO

Age	NO	NO	NO
Marriage and Civil Partnership	NO	NO	NO
Pregnancy and Maternity		<p>The HHAP for 2013/14 will include details of a room which has been identified within the Inverclyde Homelessness Centre for service users, visitors and staff to utilise if required for breastfeeding/expressing milk. The room is adjacent to the Community Nurse for Homeless People's Treatment Room and seating, signage, etc. is currently being planned.) (Fiona Cannie, Accommodation Manager, Homelessness Service is leading). (see Action within E2 below).</p> <p>The HHAP for 2013/14 will also highlight that all who wish to breastfeed/express milk within the Inverclyde Centre may do so within the Centre, and may choose to use the room identified for this purpose if they wish privacy.</p>	NO
Social and Economic Status	NO	<p>Currently, the HHAP does not focus sufficiently on access to the Employability Pathway, ie, positive day-time activity, education and training, and access to employment. The HHAP for 2013/14 will contain an</p>	NO

		Action in relation to the offering of training to the teams who work directly with clients to support them in making the link between health and employability, and to give them a greater awareness of how the new Government changes to the Welfare System may affect their clients. This training is currently offered to frontline health staff and Inverclyde Community Development Trust staff.	
Other marginalised groups (prisoners, homelessness, addictions, travellers, asylum seekers and refugees, etc)	The HHAP does not directly influence the delivery of health services to Gypsy Travellers, and although there have been previous attempts to do this, further discussions should take place on this subject to ensure that this marginalised group is enabled and supported to access health care.	NO	NO

E Actions to be taken		
		Responsibility and Timescale
E1 Changes to policy	The format of the HHAP has undergone a review which has resulted in a more lean and concise Plan which will assist in the annual self-assessment due to take place during July 2013.	Ann Drennan: By 31.08.13.

<p>E2 action to compensate for identified negative impact</p>	<p>The Health and Homelessness Action Group (HHAG) will commence discussion on the issues raised under <i>'negative impact on equalities or on different equalities groups'</i> as detailed above. <u>These issues include:</u></p> <ul style="list-style-type: none"> * A review of the requirement to support service users, and staff returning to work, to breastfeed/express within the Homelessness Service. * An increased focus on access to the 'Employability Pathway' for persons affected by Homelessness through Inverclyde Community Development Trust and Inverclyde Community Learning and Development Team to enable access to positive day-time activity, education, training and employment. * An increased focus on access to training for frontline homelessness staff in relation to Health and Employability to increase awareness and confidence of staff when referring clients to other services within Inverclyde. * A review of facilities within the Inverclyde Homelessness Centre in relation to clients with a disability or long-term condition. * A review of information in relation to Religion and Belief. * The delivery of an Awareness-Raising Session focusing on the Equality Act 2010, specifically in relation to the Protected Characteristics, for staff of the Housing Advice and Homelessness Service. * To include within the Self-Assessment of the HHAP for 2012/13, information on the Health Visitor outreach to Gypsy Travellers. 	<p>Ann Drennan: By 31.08.13.</p> <p>Fiona Cannie: By 30.06.13.</p> <p>Sara MacLean: By 31.08.13.</p> <p>Sara MacLean: By 31.08.13.</p> <p>Martin Murray: By 31.08.13.</p> <p>Martin Murray: By 30.09.13.</p> <p>Brian Young By 31.12.13</p> <p>Ann Drennan By 31.08.13</p>
<p>E3 Further monitoring – potential positive or negative impact</p>	<p>Annual Monitoring of EQIA.</p>	<p>Ann Drennan: Annual Review: 30.06.14</p>

	ANNUAL Homeless Service User Consultation Exercise.	Ann Drennan: 2 nd Annual Homeless Service User Consultation Exercise to be completed by: 30.04.13.
E4 Further information required	Information required on potential plans for adaptations to the Inverclyde Homelessness Centre re facilities for Disabled Clients (including the installation of a Loop System for people who use hearing aids; and information provided in Braille).	Martin Murray and Sara MacLean: By 31.08.13.

6. Review: Review date for policy / strategy / plan and any planned EQIA of services

Review Date for the Inverclyde CHCP Health and Homelessness Action Plan (HHAP): 30.06.14

Lead Reviewer: Name: Ann Drennan
Sign Off: Job Title: Health, Homelessness and Housing Lead, Inverclyde CHCP
Signature: Ann Drennan
Date: 21.06.13

Please email copy of the completed EQIA form to egia1@ggc.scot.nhs.uk

All other enquiries please to:

Alastair Low, Planning & Development Manager, Corporate Inequalities Team, NHS Greater Glasgow and Clyde, JB Russell House, Gartnavel Royal Hospital Tel: 0141-201-4817.