

# Equality & Poverty Impact Assessment 00818 (Version 1)

## SECTION ONE: ESSENTIAL INFORMATION

<b>Service &amp; Division:</b>	Social Work Adult Services Community Care	<b>Lead Officer Name:</b>	David Keenan
		<b>Team:</b>	Performance
		<b>Tel:</b>	01324501
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<b>Proposal:</b>	This EPIA is completed on behalf of the Equality, Inclusion and Wellbeing Service, NHS Forth Valley and Falkirk Council Sensory Services Team:  Joint British Sign Language (BSL) Plan for Falkirk 2023 - 2029	<b>Reference No:</b>	

<b>What is the Proposal?</b>	<b>Budget &amp; Other Financial Decision</b>	<b>Policy (New or Change)</b>	<b>HR Policy &amp; Practice</b>	<b>Change to Service Delivery / Service Design</b>
	No	Yes	No	No
<b>Who does the Proposal affect?</b>	<b>Service Users</b>	<b>Members of the Public</b>	<b>Employees</b>	<b>Job Applicants</b>
	Yes	Yes	Yes	Yes
<b>Other, please specify:</b>				

**Identify the main aims and projected outcome of this proposal (please add date of each update):**

30/08/2024	<p>To work in partnership to create conditions for BSL users to thrive as engaged, informed, and empowered citizens within our Forth Valley community. The projected outcomes of this joint BSL Plan are to make improvements around access, information, and inclusivity of our local services. These are aligned to the 9 Scottish Government priorities areas for the BSL community, which are as follows:</p> <ul style="list-style-type: none"> <li>• BSL Accessibility</li> <li>• Children, Young People and their Families</li> <li>• Access to Employment</li> <li>• Health &amp; Wellbeing</li> <li>• Celebrating Deaf Culture</li> <li>• BSL Data</li> <li>• Transport</li> <li>• Access to Justice</li> <li>• Democratic Participation</li> </ul>
30/08/2024	<p>To enhance partnership working and integration, removing barriers and reducing potential overlap and duplication of service delivery and support to collaboratively meet our statutory obligations to the BSL Community. The actions and objectives outlined within this plan will be owned and implemented by the NHS Forth Valley Equality, Inclusion and Wellbeing Service and Falkirk Council’s Sensory Services Team. Therefore the objectives are cost-neutral to both organisations as they are a continuation or improvement of workstreams already being undertaken.</p>

**SECTION TWO: FINANCIAL INFORMATION**

For budget changes ONLY please include information below:		Benchmark, e.g. Scottish Average	
Current spend on this service (£'0000s)	Total:		
Reduction to this service budget (£'0000s)	Per Annum:		
Increase to this service budget (£'0000s)	Per Annum:		
If this is a change to a charge or concession please complete.	Current Annual Income Total:		
	Expected Annual Income Total:		
If this is a budget decision, when will the saving be achieved?	Start Date:		
	End Date (if any):		

**SECTION THREE: EVIDENCE** Please include any evidence or relevant information that has influenced the decisions contained in this EPIA. (This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups.)

**A - Quantitative Evidence** This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

The following quantitative evidence derived from the most recent Scottish Government CENSUS (2024) has been used to inform our joint BSL Plan as it illustrates the number of BSL Users within our area and ensures our proposed workstreams and actions are reasonable and feasible for the community size. The 2024 CENSUS shows that there are 3768 individuals who use BSL in Falkirk. This confirms the potential reach of our joint BSL Plan and the potential number of service users who are also BSL users. Whilst the CENSUS does not provide specific information on intersectionality and additional protected characteristics, from both NHS Forth Valley and Falkirk Council’s data and direct engagement with the local BSL community, we can also derive the following:

- NHS Forth Valley’s Interpretation and Translation Service (part of the Equality, Inclusion and Wellbeing Service), there are 157 individuals who utilise BSL Interpreters for the purpose of health appointments. We recognise the disparity between members of the community and engagement and as part of the Plan will be encouraging engagement and exploring alternative engagement methods, whilst also seeking to uncover reasons behind why there is a discrepancy between numbers. An example of this will be direct partnership working with the Sensory Centre’s Deaf Outreach Officer for targeted interventions and signposting;
- In terms of protected characteristics and the local knowledge both services have, we know that there is a degree of intersectionality that exists, with members of our BSL Community also falling into additional categories such as members of LGBTQ+ community and a wide range of ages, race and religions. This has been taken into account for the development of our joint BSL Plan to ensure that the impact of additional protected characteristics is considered, with mitigations put in place to overcome any additional barriers that may then arise.

**B - Qualitative Evidence** This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

**Social - case studies; personal / group feedback / other**

**Direct Individual User Feedback:** Individuals who engage with our Services share their praise for the previous BSL Plan and the positive impact it has on reducing their health inequalities and access barriers. Some of the individual examples include: service users receiving letters asking them to phone a specific department/area with no other contact option; home visits being arranged without prior knowledge of communication needs/requirements; loneliness and isolation for individuals within care settings where there is no provision for BSL social interaction.

**Group Feedback from Engagement Events/Methods:** Whilst feedback on our individual services is positive, with the community grateful for the service provision within the Sensory Centre for BSL Users, there are shared issues that the community identified which have been embedded within the workstreams of the Plan. These include: difficulty in accessing information in a timely, appropriate format; lack of accessible features/pathways for interacting and contacting services (both NHS and Local Authority); lack of data sharing between services and of barriers arising from automated processes. The local BSL community have been consulted throughout previous BSL Plans and have been involved at all stages of our joint BSL Plan design. It was the community themselves who advocated for a joint Plan to avoid duplication, overlap and frustration with an aim to a more streamlined, cohesive and collaborative approach that would have better outcomes for them.

**Case Study:** As part of the launch of our joint BSL Plan, one particular service user has kindly volunteered to share their story to illustrate how the Plan will impact his life. As someone who has experienced a major illness, he has lived experience of the unique BSL patient journey and how interactions with both NHS and Local Authority were during this time. The learning from his experience has helped to inform this joint BSL Plan and he anticipates positive changes as a result of the Plan going forward, which he is happy to continue to provide feedback on and be a case study for.

**Colleagues and Stakeholders:** British Deaf Association on behalf of Scottish Government have stated that they wish to use our Joint BSL Plan as a gold standard for partnership working within the BSL community. Both internal and external colleagues have been consulted about the Plan and have provided positive feedback that it will help to enable them to consider the individual needs of BSL Users and tackle resulting health inequalities.

**Best Judgement:**

<b>Has best judgement been used in place of data/research/evidence?</b>	Yes
<b>Who provided the best judgement and what was this based on?</b>	Speciality teams and team leads across both Falkirk Council and NHS Forth Valley in addition to lived experience colleagues and service users.
<b>What gaps in data / information were identified?</b>	Specific data on intersectionality of protected characteristic groups.
<b>Is further research necessary?</b>	Yes
<b>If NO, please state why.</b>	

**SECTION FOUR: ENGAGEMENT****Engagement with individuals or organisations affected by the policy or proposal must take place****Has the proposal / policy / project been subject to engagement or consultation with service users taking into account their protected characteristics and socio-economic status?**

Yes

<p><b>If YES, please state who was engagement with.</b></p>	<p>If YES, please state who was engagement with. Multiple modes of engagement have been undertaken as part of the joint BSL Plan to ensure adequate and effective collaboration with local communities, colleagues and service users. This included active promotion and invitation to participate to the following:</p> <ul style="list-style-type: none"> <li>• BSL Users and Tactile BSL Users;</li> <li>• Family, friends and carers;</li> <li>• Staff;</li> <li>• Local Authorities and Local Councillors;</li> <li>• Local Colleges and Universities;</li> <li>• Police Scotland;</li> <li>• British Deaf Association (BDA) on behalf of Scottish Government;</li> <li>• Third Sector organisations;</li> <li>• Minority Groups.</li> </ul> <p>There were multiple ways for individuals and organisations to engage with us and provide valuable lived experience input and feedback. We were mindful of the varying requirements and accessibility needs within our local community, including those within protected characteristic groups or with potential socio-economical barriers and therefore utilised this multiple-method approach to try and mitigate against such barriers. Digital exclusion was also factored in and any online posts or engagement methods were also circulated in printed formats where appropriate/possible. We also texted directly to community members with information about how to get involved. This included:</p> <ul style="list-style-type: none"> <li>• Face-to-face meetings and events including focus groups;</li> <li>• Online sessions and opportunities to connect (utilising various multimedia resources across all our online platforms);</li> <li>• Public survey;</li> <li>• Direct targeting of local BSL Users and key community organisations;</li> <li>• Offered engagement opportunities for all staff members;</li> </ul> <p>Consultation was also conducted via our Working Group (BSL Users) and Steering Group (Joint Organisation Strategic Group). There was always an option for Interpretation or Translation of engagement methods and the offer of 1:1 discussion with a member of the team to address any accessibility issues or concerns.</p>
<p><b>If NO engagement has been conducted, please state why.</b></p>	

How was the engagement carried out?		What were the results from the engagement? Please list...
<b>Focus Group</b>	Yes	We had positive engagement and the key issues identified that were requested to be addressed within the joint plan included: <ul style="list-style-type: none"> <li>• Lack of access to information in first or preferred language;</li> <li>• Lack of prior identification/knowledge of BSL users;</li> <li>• Lack of communication/data sharing between services;</li> <li>• Lack of specialist and appropriate mental health services for Deaf people;</li> <li>• Lack of understanding and knowledge of processes for support such as how to book an Interpreter;</li> <li>• Lack of knowledge and education (self-reported) of the BSL community by staff members;</li> <li>• Difficulty accessing services.</li> </ul>
<b>Survey</b>	Yes	As above.
<b>Display / Exhibitions</b>	No	
<b>User Panels</b>	Yes	As above.
<b>Public Event</b>	Yes	As above.
<b>Other: please specify</b>		
<b>Has the proposal / policy/ project been reviewed / changed as a result of the engagement?</b>	Yes	
<b>Have the results of the engagement been fed back to the consultees?</b>	Yes	
<b>Is further engagement recommended?</b>	Yes	



## SECTION FIVE: ASSESSING THE IMPACT

**Equality Protected Characteristics:** What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposal / policy / project? This section allows you to consider other impacts, e.g. poverty, health inequalities, community justice, carers etc.

Protected Characteristic	Neutral Impact	Positive Impact	Negative Impact	Please provide evidence of the impact on this protected characteristic.
<b>Age</b>		✓		<p>We anticipate a positive impact in relation to Age at all levels as one of the key priorities is Children, Young People and their Families which will help reduce the barriers in relation to lack of information and support which is especially prevalent from birth to young adolescence, as service provision often inhibits the ability for effective engagement at the earliest possible opportunity during the life of a BSL User. The plan seeks to address some of these barriers and promote engagement and intervention at the earliest possible stage, continued throughout their development and into adult life as standard. It will seek to empower Children, Young People and their Families to know where and how to access support.</p> <p>In the wider sense, as the Plan outlines actions that will improve access to services and information, this will benefit BSL Users of all ages and make a positive impact to their lives.</p>
<b>Disability</b>		✓		<p>We appreciate and respect that individual BSL Users will make their own choice in relation to whether they identify as having a disability and the variance that will exist within the community. However, we recognise the challenges and prejudices that will occur throughout a BSL User's lifetime. This includes the use of discriminatory language and terminology, in addition to wider communication barriers. The plan will help by raising staff awareness and improving education around the wider D/deaf community.</p> <p>Therefore, we would anticipate a positive impact on not just the D/deaf community, but also the wider Disability community as it will promote disability awareness and inclusion, enhancing communication and reduced barriers.</p>
<b>Sex</b>	✓			<p>The Plan encourages equal opportunities for all, regardless of sex. Therefore there would be a neutral impact/no effect.</p>

**Public Sector Equality Duty: Scottish Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance quality of opportunity and foster good relations. Scottish specific duties include:**

<b>Religion / Belief / non-Belief</b>	✓			The Plan encourages equal opportunities for all, regardless of religion/belief/non-belief. Therefore there would be a neutral impact/no effect.
<b>Sexual Orientation</b>	✓			The Plan encourages equal opportunities for all, regardless of sexual orientation. Therefore there would be a neutral impact/no effect.
<b>Transgender</b>	✓			The Plan encourages equal opportunities for all, regardless of transgender identity. Therefore there would be a neutral impact/no effect.
<b>Pregnancy / Maternity</b>	✓			The Plan encourages equal opportunities for all, regardless of pregnancy or maternity. Therefore there would be a neutral impact/no effect.
<b>Marriage / Civil Partnership</b>	✓			The Plan encourages equal opportunities for all, regardless of marriage/civil partnership. Therefore there would be a neutral impact/no effect.
<b>Poverty</b>		✓		The Plan will consider the socio-economic impact of being a BSL User and how this will affect financial wellbeing. We will work directly with a variety of colleagues, internal and third sector, to ensure adequate signposting and support for BSL Users. This will include employability agencies, Community Link Workers and other appropriate partners. Therefore, we would aim for a positive impact in relation to poverty, with greater consideration to the wider holistic needs of an individual and the support they may require in addition to BSL Interpretation.
<b>Care Experienced</b>	✓			The Plan encourages equal opportunities for all, regardless of care experienced status. Therefore there would be a neutral impact/no effect.
<b>Other, health, community justice, carers etc.</b>		✓		The BSL Plan and associated actions and objectives will help across all services and therefore have a positive impact on health colleagues, local authority colleagues, justice colleagues, community colleagues, third sector colleagues, volunteers and carers. By raising awareness of the needs of the BSL community, it will empower individuals to feel more confident and skilled in delivering our statutory duty across these services.
<b>Risk (Identify other risks associated with this change)</b>				

	<b>Evidence of Due Regard</b>
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<p><b>Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):</b></p>	<p>By raising awareness and providing education around the culture, needs and communication requirements of BSL and tactile BSL Users, we would hope to see a reduction in discrimination, harassment, victimisation and other prohibited conduct. There is limited evidence to show that the objectives outlined within this plan could result in discrimination or harassment given the impact levels described within section 5.</p>
<p><b>Advance Equality of Opportunity:</b></p>	<p>By providing adequate support and access to services and information, we are improving the equity of this group and therefore reducing negative experiences that result in a lack of opportunity or barriers to opportunities. For example, in relation to the disproportionate support that BSL and tactile BSL Users can receive throughout their lives, we acknowledge the detrimental impact that can have on the D/deaf community having equal opportunities. The work outlined within this plan seeks to address this and promote equity, thus advancing equality of opportunity. Again, there is limited evidence to show that the objectives outlined within this plan could result in unfair advantage or disadvantage to people, given the impact levels described within section 5.</p>
<p><b>Foster Good Relations (promoting understanding and reducing prejudice):</b></p>	<p>We acknowledge that poor relations and prejudice often arise from a lack of understanding and awareness of the D/deaf community by society (and vice versa) and would be confident that the objectives within the plan seek to foster good relations by improving knowledge and understanding for both parties. There is evidence to show that the objectives outlined within this plan could result in fostering good relations as working together to enhance knowledge and understanding of different groups and their differing needs will help to build relationships (Cameo, 2018, Scottish Care).</p>

## SECTION SIX: PARTNERS / OTHER STAKEHOLDERS

Which sectors are likely to have an interest in or be affected by the proposal / policy / project?		Describe the interest / affect.
<b>Business</b>	Yes	By supporting the BSL and tactile BSL community, we would hope to have a positive effect on local businesses as we would be encouraging members of the community to assimilate more within society and therefore access local businesses more as they grow in confidence and skills to integrate without fear of harassment or discrimination. Moreover, this would also have a positive impact by increasing the talent pool of the local community that businesses can tap into for employment as we can support BSL and tactile BSL users to access recruitment support suited to their needs.
<b>Councils</b>	Yes	Plan owner. Falkirk Council's Sensory Services Team would have ownership and responsibility for undertaking their actions outlined within the plan, however they would be available to support any other departments or services within the Local Authority to make positive improvements to how they interact with the BSL or tactile BSL community.
<b>Education Sector</b>	Yes	The Education Sector would have an interest in the plan as it outlines the ways in which we will engage with Children, Young People and their Families and help to support them, signposting as required to local services or resources. Windsor Park School in particular have a very strong links with both NHS Forth Valley Equality, Inclusion and Wellbeing Service and Falkirk Council's Sensory Services Team and have been instrumental in engaging with and informing our plan.
<b>Fire</b>	Yes	The Fire Service would have an interest in the plan as it outlines the ways in which we will engage with the D/deaf community and help to support them, signposting as required to local services or resources. This may include signposting to and collaborating with the Fire Service to help support the community to access Fire Safety visits.
<b>NHS</b>	Yes	Plan owner. NHS Forth Valley's Equality, Inclusion and Wellbeing Service would have ownership and responsibility for undertaking their actions outlined within the plan, however they would be available to support any other departments or services within the NHS and HSCPs to make positive improvements to how they interact with the BSL or tactile BSL community. This can include training and awareness sessions.
<b>Integration Joint Board</b>	Yes	Although there is no statutory requirement for HSCPs to produce their own BSL Plan, they would have an interest and both NHS Forth Valley's Equality, Inclusion and Wellbeing Service and Falkirk Council's Sensory Services Team would be happy to help support them to make positive improvements to how they interact with the BSL or tactile BSL community.

<b>Police</b>	Yes	Police Scotland would have an interest in the plan as it outlines the ways in which we will engage with the D/deaf community and help to support them, signposting as required to local services or resources. This may include signposting to and collaborating with Police Scotland to help support the community to access their help as required.
<b>Third Sector</b>	Yes	There will be varying levels of interest and involvement with the Third Sector with signposting to and collaborating with individual local and national charities and third sector partners to help support the community to access their help as required. Both teams who own the plan are based within the Forth Valley Sensory Centre and will maintain close links with those situated in the building, which includes Royal National Institute of Deaf People (RNID). Furthermore, the British Deaf Association on behalf of Scottish Government are responsible for the reporting aspect of this plan and as with previous plans, we will work closely with them to ensure we are meeting the needs of our local D/deaf community.
<b>Other(s): please list and describe the nature of the relationship / impact.</b>	N/A	

## SECTION SEVEN: ACTION PLANNING

**Mitigating Actions:** If you have identified impacts on protected characteristic groups in Section 5 please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. If you are not taking any action to support or mitigate the impact you should complete the No Mitigating Actions section below instead.

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes

### No Mitigating Actions

**Please explain why you do not need to take any action to mitigate or support the impact of your proposals.**

As outlined within section 5, where there is an impact upon a protected characteristic group, this will be positive. Therefore no mitigating actions are required as this will have positive ramifications for the larger equity and inclusion agenda.

**Are actions being reported to Members?**

No

**If yes when and how ?**

**SECTION EIGHT: ASSESSMENT OUTCOME**

Only one of following statements best matches your assessment of this proposal / policy / project. Please select one and provide your reasons.

No major change required	Yes	The Plan is a guidance document that outlines what we are doing as services to support the D/deaf community and is a statutory requirement from the Scottish Government. This EPIA has confirmed that impacts will be positive or neutral for other protected characteristic groups and therefore requires no mitigating actions. As a result, no major change is required and the plan can go ahead as required.
The proposal has to be adjusted to reduce impact on protected characteristic groups	No	
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups	No	
Stop the proposal as it is potentially in breach of equality legislation	No	

**SECTION NINE: LEAD OFFICER SIGN OFF**

Lead Officer:

Signature:	<i>David Keenan</i>	Date:	08/08/2024
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**SECTION TEN: EPIA TASK GROUP ONLY**

<b>OVERALL ASSESSMENT OF EPIA:</b>	<b>Has the EPIA demonstrated the use of data, appropriate engagement, identified mitigating actions as well as ownership and appropriate review of actions to confidently demonstrate compliance with the general and public sector equality duties?</b>	Yes
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<b>ASSESSMENT FINDINGS</b>	There has been extensive consultation with the deaf/blind community and British Deaf Association want to use this as an example of best practice.	
<b>If YES, use this box to highlight evidence in support of the assessment of the EPIA</b>		
<b>If NO, use this box to highlight actions needed to improve the EPIA</b>		

<b>Where adverse impact on diverse communities has been identified and it is intended to continue with the proposal / policy / project, has justification for continuing <u>without making changes been made</u>?</b>	Yes	If YES, please describe: Due to the fact that all impacts would be positive or neutral.
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**LEVEL OF IMPACT: The EPIA Task Group has agreed the following level of impact on the protected characteristic groups highlighted within the EPIA**

LEVEL		COMMENTS
HIGH	Yes	For positive reasons and positive/neutral impact.
MEDIUM	Yes / No	
LOW	Yes / No	

**SECTION ELEVEN: CHIEF OFFICER SIGN OFF**

<b>Director / Head of Service:</b>			
<b>Signature:</b>	<i>Suzanne Thomson</i>	<b>Date:</b>	12/08/2024