

## Equality, Fairness and Rights Impact Assessment (EFRIA)

The Equality, Fairness and Rights Impact Assessment (EFRIA) is one of our specific duties to [assess the impact](#) of applying a new or revised policy or practice against the needs of the General Equality Duty. This means East Renfrewshire Council must be mindful when assessing impact against these needs to:

- ensure the policy does not discriminate unlawfully
- consider how the policy might better advance equality of opportunity
- consider whether the policy will affect good relations between different groups

The Fairer Scotland Duty places a legal responsibility on particular public bodies in Scotland to actively consider ('pay due regard' to) how they can reduce inequalities of outcome caused by socioeconomic disadvantage, when making strategic decisions. The UN Convention of the Rights of the Child (UNCRC) is an international human rights treaty which sets out the rights every child has and has been incorporated into Scottish Law as the [United Nations Convention on the Rights of the Child \(Incorporation\) \(Scotland\) Act 2024](#).

The Equality, Fairness and Rights Impact assessment considers how a policy\* could impact on the needs of individuals protected by the [Public Sector Equality Duty](#), [the Fairer Scotland Duty](#) and the [UN Convention of the Rights of the Child](#).

Please consult the [EFRIA guidance flowchart](#) to help you complete this assessment.

<b>Name of policy*:</b>	General Medical Services Provision
<b>Description of policy:</b>	Closure of Greenlaw and Pollokshields Medical Practices
<b>Why is the policy required?</b>	Previous GP Contractors handed back their GMS Contract on 31 <sup>st</sup> July 2024
<b>Date EFIRA completed:</b>	05 February 2025
<b>Completed by:</b>	Claire Fisher, Craig Menzies, Mark Mulhern
<b>Lead officer for policy:</b>	Julie Murray
<b>Department:</b>	East Renfrewshire Health & Social Care Partnership

\*The term 'policy' covers any work or function of East Renfrewshire Council i.e. customer and service delivery, staffing, criteria, practices, proposals, activities and decision-making

**Guidance – please read**

**Section 1**

This section enables you to determine if a full assessment is required. If a full assessment is not required, this must be clearly stated in **Section 9** of the form.

Section **2-8** is the full assessment covering the sections listed below:

<b>2</b>	<b>Engagement and Consultation</b>  Give details of how different groups have been consulted about the policy.
<b>3</b>	<b>Impact on individuals or groups with protected characteristics</b>  How will the policy impact individuals or groups who fall under one of the nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation?
<b>4</b>	<b>Impact on socio-economic disadvantage</b>  How will the policy impact individuals or groups disadvantaged by poverty, low income, homelessness or lack of or low-level educational qualifications?
<b>5</b>	<b>Impact on Children and Young People</b>  How will the policy impact on the rights and needs of children and young people?
<b>6</b>	<b>Contractors and suppliers</b>  Will the policy be delivered by any contractors or suppliers in full or partially?
<b>7</b>	<b>Outcome of assessment and action plan</b>  What is your decision based on the assessment and are there any mitigations or actions that need to be addressed?
<b>8</b>	<b>Approval</b>  Details of when and who approved the policy.

**Section 9** should only be completed where the screening shows no assessment is required

When completing the assessment you must consider relevant evidence, including information received from equality groups. This evidence should inform the result of your impact assessment. You're required to take action to address any issues identified, such

as removing or mitigating any negative impacts, where possible, and enhancing any potential for positive impact. If any adverse impact could result in unlawful discrimination, the policy must be fully reviewed and amended.

**All impact assessments will be published on the Council website**

### 1. Screening

**This section should be completed to establish if a full assessment is required.**

<b>1.1 What is the nature of the work or activity?</b>	
Select a category from below that explains the work or activity you are doing.	
<input type="checkbox"/> Policy or Strategy <input type="checkbox"/> Programme or Plan <input type="checkbox"/> Project delivery X Service or Function <input type="checkbox"/> Budget proposal <input type="checkbox"/> Other please state: <a href="#">Click or tap here to enter text.</a>	<b>Is this work or activity...</b>  <input type="checkbox"/> New x Change or review of existing <input type="checkbox"/> Other- Please state: <a href="#">Click or tap here to enter text.</a>
<b>1.2 What will happen as a result of this policy?</b>	
What changes will come about for individuals and groups through this policy?- Select all that apply	
<input type="checkbox"/> Change to Council, Trust or HSCP charging arrangements (including introduction, removal, increase or decrease) x Change to how a service is delivered (including addition, change or removal of practices/procedures/processes) x Change to provision of services or staffing <input type="checkbox"/> Change to entitlement or eligibility for service delivery or welfare/benefit access <input type="checkbox"/> Other. Please state: <a href="#">Click or tap here to enter text.</a>	
<b>1.3 What groups of individuals are likely to be impacted by this policy?</b>	
Select which groups of individuals are likely to be impacted positively or negatively if this policy is implemented.	

- ☒ The policy has potential to impact **individuals with protected characteristics\***
- ☒ The policy has potential to impact **socioeconomic disadvantage\*\* for individuals**
- ☐ The policy has potential to impact **children and young people up to the age of 18**
- ☐ The policy has no impact on those specified above.

\***Protected Characteristics** are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

\*\***Socio-economic disadvantage** is where an individual is disadvantaged by poverty, low income, homelessness or lack of or low-level educational qualifications

#### 1.4 Is there any potential indication or evidence that the policy will discriminate unlawfully; affect equality of opportunity for different groups or affect good relations between different groups?

Will any individuals be treated less fairly than others if this policy is implemented? This includes employees, residents, community groups and visitors to the area.

- ☐ Yes
- ☒ No
- ☐ Don't Know

Every individual registered with the Greenlaw Medical Practice and branch surgery Pollokshields Medical Practice will be registered with another GP in their locality. We have engaged with local GP Practices to discuss possibility of reallocating patients and these discussions have been positive. Individuals will continue to receive all the GMS services currently provided, however for some individuals there may be negative impacts in terms of travel costs, time and convenience. We will gather feedback in relation to this and should further support be required we will consult with third sector partners such as My Wee Red Bus Community Transport Scheme.

Individuals may have existing relationships with GP's and other practice staff and may be anxious about establishing new relationships, however the full range of services will be continued to be offered with additional support available for those with accessibility barriers, be they physical, cognitive, cultural or religious.

Whilst we will allocate individuals to a new GP practice, with the due consideration outlined above, individuals retain the right to change their GP practice and register with a practice of their choice within their catchment.

**Review your answers above.**

- If the policy has **no impact on individuals**, and you have selected 'no' to section 1.3, an impact assessment is not required. **GO TO SECTION 9**
- If the policy will have an impact on individuals and/or you have selected 'yes or don't know' to section 1.3, complete the full assessment. **GO TO SECTION 2**

## 2. Engagement and Consultation

**This section will assess how the policy is being communicated to certain groups and how you have consulted them.**

### **2.1 How have individuals (incl. children & young people) who might be affected by the policy been consulted or involved?**

This can include a summary of findings from recent consultations, surveys, user research or customer testing that has been carried out. Include dates and information.

Following the previous contractors handing back their contract, the HSCP has undertaken an extensive options appraisal with NHS GGC to explore future service delivery, however due to being unsuccessful in obtaining a lease for the existing premises, and unable to source alternative premises to allow a retender, the Practice will require to be closed. Given this situation we have been unable to consult with individuals registered with the practice as there is no other option available.

## 2.2 How will you communicate information about this policy to individuals who have: hearing and/or sight loss; English as an additional language; are digitally excluded; have literacy/numeracy barriers?

Think about how you will communicate information about the policy to the above individuals. This may include printed materials being accessible in other formats, e.g. Braille, easy to read, translated in other languages. More information can be found [here](#).

Patient communications by SMS text message, poster and website materials have been produced.

The NHS GGC translation service can be used to help patients whom English is not their first language.

### 3. Impact on groups with protected characteristics

**This section will assess if the policy has potential to impact individuals with protected characteristics. You should consider any evidence or information you have on how it will affect different groups of individuals, both positively and negatively.**

Below is a suggested list of sources:

- Input from local Councillors
- Findings from engagement exercise and consultations.
- Information or feedback from groups of individuals, such as equality interest organisations or groups who speak on behalf of others
- National, regional or local statistics
- Analysis of enquiries or complaints from customers
- Recommendations from inspections or audits
- National or regional research to identify similar issues
- Comparisons with similar policies in other departments or authorities to identify similar issues

**You may want to consider collecting new evidence that you don't have but think will be relevant.** For example: setting up meetings or focus groups, carrying out user research.

Please find other sources of evidence on page 9 of the [EFRIA guidance flowchart](#).

3.1 Use the table below to consider how the policy may impact on a particular group with protected characteristics through reviewing the evidence, experience and needs of this group		
Characteristics/circumstances	Evidence, experience and needs- outline any data or research that shows how this group may be impacted (include sources)	Will the impact on this group be positive, neutral or negative and why?
Age	Elderly people are more likely to require more frequent GP visits. Some elderly people may have issues travelling to GP appointments.	Potentially negative if they have to travel further or wait longer for appointments.
Disability or long term health condition	As above	As above
Race	Some people from an ethnic minority background will want to ensure that their cultural and religious beliefs are respected.  We are aware of increased incidence of Type 2 diabetes within population	Potentially negative – People may have existing relationships with GP's and staff from Greenlaw Practice and may be anxious that moving to a new practice may affect this.  Impact neutral as will be able to access existing healthcare for management of diabetes
Sex	During pregnancy woman may need to visit their GP more frequently.	Potentially negative if they have to travel further however will still have access to urgent care.



	<p>Woman are more likely to take the lead role in childcare</p> <p>Woman are more likely to be carers</p>	<p>Potentially more or less travel time</p> <p>Potentially more or less travel time</p>
Gender reassignment	N/a	N/a
Marriage/Civil Partnership (only applicable to Council employment policy)	N/a	N/a
Pregnancy / Maternity	During pregnancy woman may need to visit their GP more frequently.	Potentially negative if they have to travel further however will still have access to urgent GP care and ante-natal care.
Religion / Belief	N/a	N/a
Sexual orientation	N/a	N/a
Providing unpaid care	Carers are likely to visit their GP's more frequently either for themselves or in support of the person they care for	Potentially negative if they have to travel further or wait longer for appointments.

Any other relevant groups e.g. unemployed people, people experiencing homelessness, care leavers, people involved in the criminal justice system, people with literacy/numeracy barriers, people living in rural communities.	There may be additional factors in terms of cost or availability of transport that make it more challenging for people to access the GP practice that they are moved to	Potentially positive or negative in terms of access
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### 3.2 Are there known inequalities within the policy?

For example: barriers to transport for some groups; opening hours and location, organisational pay, terms or conditions; how public information is provided?

No

### 3.3 In what ways, if any, would this policy contribute to discrimination or help to eliminate it?

Discrimination means treating individuals differently from others. For example, not recruiting someone as they are deemed too old/young; or a support group running on an upper floor with no lift access will discriminate against people with mobility issues or wheelchair users

N/A

### **3.4 In what ways, if any, would this policy advance or undermine equality of opportunity?**

This is when individuals from different backgrounds are treated fairly through providing an equal footing or level playfield to achieve outcomes. For example, children who have additional support needs are provided with teaching support to fully participate in the school curriculum or a deaf BSL user is provided with a BSL interpreter at health appointments.

The change will ensure that every individual registered with the Greenlaw Medical Practice continues to receive access to a GP and other primary care services that meet their needs.

### **3.5 In what ways, if any, would this policy foster or undermine good relations between groups of individuals?**

Consider aspects that may tackle prejudice or promote understanding between different groups. For example, ensuring new arrivals and refugees are given supports to integrate within local communities or an LGBTQI+ youth group provide training on LGBTQI+ experiences to a local faith group.

**N/A**

#### 4. Impact on socio-economic disadvantage

**This section will assess how the policy may impact socio-economic disadvantage for individuals.**

**Socio-economic disadvantage** is where an individual is disadvantaged by poverty, low income, homelessness or lack of or low-level educational qualifications. Socio-economic disadvantage can be experienced in both geographical communities and communities of interest i.e. a group that share a common characteristic or circumstance. In East Renfrewshire there are a number of communities, known as locality planning areas, where people are at greater risk of experiencing socio-economic disadvantage including,

- Barrhead – Dunterlie, East Arthurlie and Dovecothall
- Auchenback
- Neilston
- Thornliebank

Consider the policy itself and the way it will be implemented. How will this deliver different experiences for individuals in East Renfrewshire?

##### 4.1 In the section below consider how the policy may impact socio-economic disadvantage through reviewing the evidence, experience and needs of this group

Characteristics/circumstances	Evidence, experience and needs- outline any data or research that shows how this group may be impacted (include sources)	Will the impact on this group be positive, neutral or negative and why?
Socio-economic		

	The Practice has a wide catchment area. There are some patients residents in the highest SIMD postcodes. ( SIMD.scot website 2020 )	For some people location to a new GP practice will be closer to their home and more accessible by public transport for others the opposite may be true.
<b>4.2 Consider the impact outline in section 4.1, In what way would the policy alleviate or increase inequalities in socio-economic disadvantage?</b>		
Consider common inequalities such as poorer skills and attainment; lower paid and less secure work; greater chance of being a victim of crime; less chance of being treated with dignity and respect; lower healthy life expectancy; lower feeling of control over decisions that affect you.		
The proposal will ensure that every individual has continuing access to General Medical Services.		
<b>4.3 What opportunities are there within this policy and the way it will be implemented to promote inclusion, participation, dignity and empowerment of people experiencing socio-economic disadvantage?</b>		
For example, a new health centre is being built and considers affordability of public transport options for residents.		
Some people may experience additional travel cost, time and inconvenience. Reallocation to most suitable alternative Practice geographically or with transport options will be a priority.		
<b>4.4 Is there anything in particular that will be done to address the multiple inequalities experienced by some people in Auchenback, Barrhead, Neilston and Thornliebank?</b>		
Patients will be allocated to most suitable alternative GP Practice in geographical location.		

## 5. Impact on Children and Young People

**This section must be completed if any potential impact on children and young individuals up to the age of 18 have been identified in sections 1-4.**

United Nations Convention on the Rights of the Child (Scotland) Act 2024 places a legal duty on public authorities to respect and protect children's rights in the work they do.

There are a range of elements that the Council must consider in supporting these rights including:

- Ensuring that children and young people have a voice in decisions that affect them – both directly and indirectly;
- Undertaking assessments of how well the Council is protecting children, including children's rights and wellbeing impact assessments and considering how budget planning supports better outcomes for children and young people

### **5.1 Are there known impacts on children and young people within the subject matter of the policy?**

For example, changes to out-of-school services, employment support for parents, play parks.

No impacts on children.

We will ensure families with children are registered together with new provider.

General Medical Services and Child Health Surveillance services will continue to be delivered.

If there is no impact on children and young people GO TO SECTION 6

5.2 In the section below outline the UN Convention on the Rights of the Child (UNCRC) General principle that is relevant, the particular groups of children that will be affected and how this will impact them		
Which <a href="#">General Principles of UNCRC</a> are relevant to this policy/measure?  Tick all that apply		Which particular groups of children and young people are affected by this policy? (e.g. young children, children with disabilities, children living in poverty, children in care, young people who offend).
<b>Article 2</b> <b>Non-discrimination</b> Children should not be discriminated against in the enjoyment of their rights. No child should be discriminated against because of the situation or status of their parent/carer(s).	<input type="checkbox"/>	
<b>Article 3</b> <b>Best interests of the child</b> Every decision and action taken relating to a child must be in their best interests. Governments must take all appropriate legislative and administrative measures to ensure that children have the protection and care necessary for their wellbeing - and that the institutions, services and	<input type="checkbox"/>	

facilities responsible for their care and protection conform with established standards.		
<b>Article 6</b> <b>Life, survival and development</b> Every child has a right to life and to develop to their full potential.	<input type="checkbox"/>	
<b>Article 12</b> <b>Respect for the views of the child</b> Every child has a right to express their views and have them given due weight in accordance with their age and maturity. This includes involving children in budget decisions that affect them. Children should be provided with the opportunity to be heard, either directly or through a representative or appropriate body.	<input type="checkbox"/>	
<b>Which <a href="#">additional articles</a> are relevant to this policy/measure?</b> List all that apply		

In relation to the articles identified above, explain how the impact will be positive, negative or neutral.



Relevant identified Article of UNCRC	Impact category (Positive/Negative/Neutral)	Assessment of impact (including consideration of whether the policy might impact different groups of children and young people in any other way).
<b>5.3 What opportunities are there within this policy to advance or undermine the rights of children and young people?</b> Explain how the policy can strengthen or weaken the rights of children and young individuals		
<b>5.4 What opportunities are there within this policy to protect and promote the wellbeing of children and young people?</b> For example promoting physical activity and healthy eating.		

## 6. Contractors and suppliers

### 6.1 Will the policy be carried out by contractors or suppliers?

This includes fully or partially. If yes, how will you incorporate equality expectations into the contract?

All local GP Practices are independent contractors who hold a contract with NHS Greater Glasgow & Clyde, and operate under 2018 General Medical Services national contract regulations.

## 7. Outcome of assessment and action plan

You have completed sections 1-6 above and assessed the impact of the policy on individuals with protected characteristics, those experiencing socio-economic disadvantage and children and young people. The following section outlines your decision based on this assessment, mitigations and actions that can be taken to reduce any negative impacts.

### 7.1 Having assessed the impact of the policy under sections 3,4 and 5 select the most appropriate outcome

Which option below best describes your next steps?

☒ Continue the policy as is

☐ Adjust the policy

☐ Stop the policy

### 7.2 Are there any significant and relevant information gaps that have not been filled during the development of this policy and how do you plan to address these during the life of the policy?

Given the circumstances of the contract resignation by Greenlaw / Pollokshields Medical Practice we have been unable to undertake any level of public engagement with people who use the practice, however we have undertaken a full options appraisal.

We will produce a range of communications to inform patients and other key stakeholders to advise of this policy. We will publicise an email address for queries, and a website with Frequently Asked Questions. We will also hold patient information sessions to allow patients to answer questions and will provide Q&A on website.

**7.3 Briefly summarise how your evidence and assessment demonstrates any potential impacts, both positive and negative, on groups with protected characteristics from this policy?**

Individuals will continue to receive the full range of GP Services.

The only change will be where these services are accessed. All new GP practices will be fully accessible and respectful of cultural, religious and language issues. All Practices have access to NHS GGC interpreting services.

Consideration will be given to ensuring people who as a result of protected characteristics, may visit their GP practice more frequently and we will register these individuals with Practice who we think are the most suitable.

We believe that by taking on the responsibility for registering people with the GP practices that have the capacity to take on a number of new registrations, we will make the process efficient and effective for both the practices and individuals, however, if patients are unhappy with the practice that we register them with, they have the right to register at another GP Practice within their locality.

Remote consultations and Home Visits will still be available for those unable to physically attend their GP.

**7.4 Briefly summarise how your evidence and assessment demonstrates any potential impact, both positive and negative, on individuals and communities experiencing socio-economic disadvantage from this policy?**

The change of location may mean some individuals incur additional travel cost. Consideration will be given to those individuals living in the highest SIMD areas affected by the closure of Greenlaw practice and allocate them to the most convenient GP practice.

We will continue to engage with the GP practices that take on new registrations and should travel cost be an issue we will review what actions can be taken to mitigate this.

Remote consultations and Home Visits will still be available for those unable to physically attend their GP Practice.

**7.5 Briefly summarise how your evidence and assessment demonstrates any potential impacts, both positive and negative, on the rights of children and young people from this policy?**

No impact. General Medical Services will continue to be provided.

Families with children will be registered together with new provider.

**7.6 How long will this policy be in place and when is it scheduled for review?**

Is this a temporary or permanent change and are there plans to review the policy?

Permanent change with ongoing review led by Clinical Director.

**7.7 Based on the findings from this impact assessment, outline any mitigating actions that will reduce the impact caused by the policy on individuals, including children and young people. The actions should also outline the communication and implementation of the policy.**

Identified adverse impact	Mitigating actions	Timeline	Responsible person


## 8. Approval

**If the full impact assessment has been completed, complete below.**

<b>Name of policy:</b>	Closure of Greenlaw and Pollokshields Medical Practice
<b>Date approved:</b>	5 February 2025
<b>Approved by:</b>  <b>(Head of Service/Director level)</b>	Julie Murray  Chief Officer
<b>Department:</b>	ER HSCP

## 9. No assessment required

**If the screening has indicated a full assessment is not required, complete below.**

Policy/Decision Title	
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Department/ Service	
Responsible officer for taking decision	
Rationale for decision	<b>Please record why an assessment is not required and what your justification is for making that decision. This must include confirmation that the policy has no relevance for people with protected characteristics or impact on human rights or socio-economic inequalities.</b>
<b>Declaration:</b> <b>I confirm the decision <u>not</u> to carry out an Equality, Fairness and Rights Impact Assessment has been authorised by:</b>  <b>Name and Job Title:</b>  <b>Date Authorisation given:</b>	

## Version Control

Date of change	Amendment	Owner
Feb 2021	First publication	C Coburn
June 2023	Introduction and Guidance sections added and formatting changes throughout	C Coburn
Feb 2024	Updating UNCRC section following legislative change	J Breslin
October 2024	Refinements after reviewing	M McIntyre