

Patient Safety Commissioner Bill

Island Communities Impact Assessment Screening Questions

October 2022



Scottish Government
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Step 1 – develop a clear understanding of your objectives

- What are the objectives of the policy, strategy or service?
- Do you need to consult?
- How are islands identified for the purpose of the policy, strategy or service?
- What are the intended impacts/outcomes and how do these potentially differ in the islands?
- Is the policy, strategy or service new?

The aim of the legislative proposal is to establish a Patient Safety Commissioner (PSC) for Scotland, who will work with patients and members of the public to make improvements to patient safety.

This is a new Parliamentary office, which is to benefit patients across the whole of Scotland, regardless of their location; islands are therefore not specifically identified. This office is not intended to replace existing mechanisms for raising concerns or providing feedback on health services. The office will be mainland-based but this will not preclude travel to island communities if required.

Step 2 – gather your data and identify your stakeholders

- What data is available about the current situation in the islands?
- Do you need to consult?
- How does any existing data differ between islands?
- Are there any existing design features or mitigations in place?

There is no specific data collected or maintained about rates of patient safety incidents in geographic areas, however anecdotal evidence suggests that there are no higher or lower rates of patient safety incidents in any particular area of Scotland. Rates of complaints do not show any pattern of differences depending on location either.

We know that some health services are less readily available in remote and rural locations in Scotland, including islands. However if this were seen to cause an impact on patient safety the PSC could decide to investigate this and make recommendations if they wished.

We will ensure that the public have the ability to communicate with the PSC's office by a range of means – for example, by post or telephone, not just digitally.

Step 3 – consultation

- Who do you need to consult with?
- How will you carry out your consultation and in what timescales?
- What questions will you ask when considering how to address island realities?

- What information has already been gathered through consultations and what concerns have been raised previously by island communities?
- Is your consultation robust and meaningful and sufficient to comply with the Section 7 duty?

In the public consultation on the establishment of a PSC carried out in 2021 we asked: “If you live in an island community, what are your views on how having a [PSC] might affect access to safe, high quality public services where you live?”

We received 50 responses to this question. There was general agreement that the PSC should work to ensure equity across Scotland, and that our proposals did not seem to suggest otherwise. The ability to communicate directly with the PSC with no managerial hierarchy would help to build relations with all communities; the PSC could highlight to the NHS or government where patients were at a disadvantage due to their location. The PSC should have an awareness of time and location-critical needs. One respondent was concerned that the PSC would raise the minimum standard of care to one which could not be provided in remote or rural communities, or provide it equably with those who live in urban areas. Another respondent said that with restricted choice in healthcare provider some island residents may be fearful of raising safety concerns, and were therefore more vulnerable. One respondent highlighted that some residents of island communities feel their voice is not heard in mainland-based decision making, and that the PSC could be an advocate for that. It would be for the PSC to decide how best to engage with island, remote and rural communities and address their concerns and needs.

We feel that as the PSC will work across the whole of Scotland and benefit the population equally there is not further requirement to consult.

Step 4 – assessment

- Does your assessment identify any unique impacts on island communities?
- Does your assessment identify any potential barriers or wider impacts?
- How will you address these?

No unique impacts.

No potential barriers or wider impacts.

Step 5 – preparing your ICIA

You must now determine whether in your opinion your policy, strategy or service is likely to have an effect on an island community which is significantly different from its effect on other communities (including other island communities).

If your answer is NO to the above question, a full ICIA will NOT be required and you can proceed to Step Six.

If the answer is YES, an ICIA must be prepared and you should proceed to Step Five.

To form your opinion, the following questions should be considered:

- Does the evidence show different circumstances or different expectations or needs, or different experiences or outcomes (such as different levels of satisfaction, or different rates of participation)? **No**
- Are these different effects likely? **No**
- Are these effects significantly different? **No**
- Could the effect amount to a disadvantage for an island community compared to the mainland or between island groups? **No**

Following consideration of steps 1-4 it was concluded that a full impact assessment was not required.

Step 6 – making adjustments to your work

- Should the delivery mechanisms/mitigations vary in different communities? **No**
- Do you need to consult with island communities in respect of mechanisms or mitigations? **No**
- Have island circumstances been factored into the evaluation process? **N/A**
- Have any island-specific indicators/targets been identified that require monitoring? **N/A**
- How will outcomes be measured on the islands? **N/A**
- How has the policy, strategy or service affected island communities? **N/A**
- How will lessons learned in this ICIA inform future policy making and service delivery? **N/A**

Step 7 – publishing your ICIA

- Have you presented your ICIA in an Easy Read format? **N/A**
- Does it need to be presented in Gaelic or any other languages? **N/A**
- Where will you publish your ICIA and will relevant stakeholders be able to easily access it? **The screening questions will be published on the Scottish Government website**
- Who will sign-off your final ICIA and why? **Having had agreement from the Senior Island Communities Policy Lead (Lewis MacAskill) that a full impact assessment is not required, this screening sheet will be signed off by DD Planning & Quality**

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|------------------------------|-----------------------|
| ICIA screening completed by: | Jenny Hunt |
| Position: | Senior Policy Manager |
| Signature: | <i>Jenny Hunt</i> |
| Date completed: | 31 May 2022 |

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|-----------------------------|------------------------------------|
| ICIA screening approved by: | Lynne Nicol |
| Position: | Deputy Director Planning & Quality |
| Signature: | <i>Lynne Nicol</i> |
| Date approved: | 14/07/2022 |



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The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-80435-940-2 (web only)

Published by The Scottish Government, October 2022

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS1154642 (10/22)

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