

# Integrated Impact Assessment – Summary Report

---

Each of the numbered sections below must be inter completed  
Please state if the IIA is interim or final: **FINAL**

## 1. Title of proposal

Review of specialist community care assistant service for deaf people, with BSL interpretation/translation duty service.

## 2. What will change as a result of this proposal?

Not to renew or extend the contract is due to reach the end of the original contracted period. The Savings and Recovery Programme 2025-26 will consist of 19 projects with a combined saving target of £28.69 million. Block contract management and Rationalisation accounts towards £2.2 million of this sum and this contract falls within this scope.

- (a) The Current contract would not be extended beyond 31<sup>st</sup> September 2025.
- (b) The current operating model provided by Deaf Action would cease to deliver the above contract for people using BSL who live in Edinburgh.
- (c) BSL users will require to use a range of alternative options to receive information, advice and assistance to access support services and achieve improved independence.

## 3. Briefly describe public involvement in this proposal to date and planned

An initial draft of the 2025/26 Savings Recovery Programme was considered by the Edinburgh IJB at their meeting on 17 December 2024 as part of the Medium-Term Financial Strategy update. Papers are available on [the City of Edinburgh Council's website](#)

The finalised programme was approved by the Edinburgh Integration Joint Board on 25 March 2025.

Engagement was undertaken and feedback considered with a previous IIA (June 2024) when the Social Worker element was removed from this contract.

Some EHSCP and CEC staff who are BSL users, use BSL or support deaf/BSL users have contributed their feedback along with staff from a range of support services for the deaf/ deafblind/BSL user community. Volunteers for BSL users also provided their feedback. Carer organisations were invited to join or give feedback. Support services for the deaf/blind/deaf/BSL user community were also asked to invite service-users and carers to the IIA meeting as advocates/representatives but none responded to the invitation.

No further engagement regarding public involvement has been undertaken or planned.

**4. Is the proposal considered strategic under the Fairer Scotland Duty?**

No

**5. Date of IIA**  
21st May 2025

**6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)**

Name	Job Title	Date of IIA training
Liz Jones	CEO Deaf Action, liz.jones@deafaction.org	
Mathew Fenlon	Care Services Manager, <a href="mailto:matthew.fenlon@deafaction.org">matthew.fenlon@deafaction.org</a>	
Steven Cafferty	Community Care Assistant (CCA) Deaf Action, <a href="mailto:Steven.Cafferty@deafaction.org">Steven.Cafferty@deafaction.org</a>	
Mike Crossland	Contracts team EHSCP <a href="mailto:Mike.crossland@edinburgh.gov.uk">Mike.crossland@edinburgh.gov.uk</a>	
Cat Young	Assistant Programme Manager Strategic Planning <a href="mailto:cat.young@nhs.scot">cat.young@nhs.scot</a>	
Jayne Kemp	Strategic Planning and Commissioning officer, EHSCP <a href="mailto:Jayne.kemp@edinburgh.gov.uk">Jayne.kemp@edinburgh.gov.uk</a>	Refresher session 8/01/2025
Susan Robertson	Strategic Planning and Commissioning officer, EHSCP <a href="mailto:Susan.robertson1@edinburgh.gov.uk">Susan.robertson1@edinburgh.gov.uk</a>	March 2022
Rene F. Rigby MBE	Independent Sector Lead City of Edinburgh Rene Rigby <a href="mailto:rene.rigby@scottishcare.org">rene.rigby@scottishcare.org</a>	
Abbie Todd	BSL Interpreter, Deaf Action <a href="mailto:abbie.todd@deafaction.org">abbie.todd@deafaction.org</a>	
Megan Frickleton	Interpreter, Deaf Action <a href="mailto:megan.frickleton@deafaction.org">megan.frickleton@deafaction.org</a>	
Avril Hepner	British Deaf Association avril.hepner@bda.org.uk	
Jennifer Moir	EHSCP Social work EHSCP <a href="mailto:Jennifer.Moir1@edinburgh.gov.uk">Jennifer.Moir1@edinburgh.gov.uk</a>	
Fiona Stewart	Development Officer, Deaf and Hard of Hearing (Adult) Learners' Service. <a href="mailto:fiona.stewart@ea.edin.sch.uk">fiona.stewart@ea.edin.sch.uk</a>	

Shelagh Swithenbank	Adults/Adults carers Midlothian EHSCP <a href="mailto:Shelagh.swithenbank@midklothian.gov.uk">Shelagh.swithenbank@midklothian.gov.uk</a>	
Lynsey Rosie	Deputy Headteacher, Additional Support for Learning Service. <a href="mailto:Lynsey.Rosie@ea.edin.sch.uk">Lynsey.Rosie@ea.edin.sch.uk</a>	18/05/2022

## Apologies

Name	Job Title	Date of IIA training
Robert Smith	Strategy Manager (Interim), Edinburgh Health and Social Care Partnership <a href="mailto:R.Smith@edinburgh.gov.uk">R.Smith@edinburgh.gov.uk</a>	15/12/2021
Eleanor Cunningham	Lead Policy and Insight Officer Strategy Chief Executive's Office The City of Edinburgh Council <a href="mailto:Eleanor.Cunningham@edinburgh.gov.uk">Eleanor.Cunningham@edinburgh.gov.uk</a>	
Christine Johnston	Christine Service Manager – Strategic Planning & Commissioning East Lothian Health & Social Care Partnership <a href="mailto:cjohnston5@eastlothian.gov.uk">cjohnston5@eastlothian.gov.uk</a>	
Barbara Brown	Advanced Occupational Therapist NHS Lothian Scottish Mental Health Support for Deaf People <a href="mailto:barbara.brown6@nhs.scot">barbara.brown6@nhs.scot</a>	

## 7. Evidence available at the time of the IIA session

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need	<a href="https://www.scotlandscensus.gov.uk/2022-results/scotland-s-census-2022-ethnic-group-national-identity-language-and-religion/">https://www.scotlandscensus.gov.uk/2022-results/scotland-s-census-2022-ethnic-group-national-identity-language-and-religion/</a>	Scottish Consensus, March 2022 states 195 people reported using BSL as their main language (first or preferred language at home) - for City of Edinburgh area. BSL users may have English as their 2 <sup>nd</sup> or 3 <sup>rd</sup> language.  This data is a key point to consider regarding the demand for the service and a significant factor when evaluating the scope and sustainability of contract.

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p data-bbox="491 1480 884 1659"> <a href="https://rnid.org.uk/get-involved/research-and-policy/facts-and-figures/prevalence-of-deafness-and-hearing-loss/">https://rnid.org.uk/get-involved/research-and-policy/facts-and-figures/prevalence-of-deafness-and-hearing-loss/</a> </p> <p data-bbox="491 1921 938 1989"> <a href="#">Population and demographics - Edinburgh Health &amp; Social</a> </p>	<p data-bbox="965 456 1362 636">           This does not capture all BSL users- such as those who learn BSL as a second language, or who use it socially or professionally.         </p> <p data-bbox="965 674 1385 1406">           Strong opinions were shared within IIA session their concern were about the statement in the evidence table that stated “BSL users cannot read and write”- a request was made to remove this as the term “means we are illiterate, it’s not true”...It’s just that for reading, it is understanding the grammar that is the issue as it is a different language ...Most of us can read and write actually and it gives the wrong image”.            Recommendation to replace with: BSL users may have English as their 2<sup>nd</sup> or 3<sup>rd</sup> language. (See above)         </p> <p data-bbox="965 1444 1378 1771"> <u>Hearing loss</u>            1 million people in Scotland have hearing loss or tinnitus, estimated 100,000 in Scotland have severe enough hearing loss to not be able to hear most conversational speech. (est.10,000 in Edinburgh).         </p> <p data-bbox="965 1809 1385 2024">           The population of Edinburgh in mid-2021 was estimated to be 526,470In common with other Scottish cities, the mid-year population estimate for 2021 showed a slight drop         </p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<a href="http://edinburghhsc.scot">Care Partnership (edinburghhsc.scot)</a>	<p>for Edinburgh, from 527,620 to 526,470</p> <p>NRS projects Scotland’s population is to fall in the next decade, starting around 2029, and if past trends continue, by 2045 Scotland will have a smaller and older population. 15.4% of the population of Edinburgh are 65+</p>
Data on service uptake/access	Quarterly Reports submitted which include reports on KPIs.	<p>Contract monitoring return data demonstrates BSL users are receiving a timely responsive using an open access route to support with a weekly duty drop- in and some additional visits. They receive information, advice, and assistance with communication support via direct dialogue from Community Care Assistants (CCAs) who are BSL users.</p> <p><b>Community Care Assistant role</b> The Community Care Assistant duty service remained in place following the removal of the Social Worker role with amended Key Performance Indicators and monitoring requirements.</p> <p>Contract monitoring return data demonstrates a significant decrease in activity with the CCA role following the cessation of the Social Worker role. Assessments, reviews and referrals have not been</p>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		<p>undertaken as initially planned.</p> <p>Swift data (as of February 2025) details there are currently 84 individuals who have an involvement with Deaf Action as their key team.</p> <p>Full quarter data return from the provider details contact with 23 individual people consisting of 45 tasks in duty sessions and a further 59 tasks out-with duty session, such as contact through whatsapp, email and phone calls.</p> <p>These tasks involved; engaging with GP services, advocating for and supporting a person with accessing other services, helping with visa applications and equipment.</p> <p>Contribution to assessment of need and review is projected not to meet target for this year between Jan to March 2025 (target 10 in a year).</p> <p>It was expressed by some in attendance that there has been minimal communication between the provider and Social Care staff regarding reviews and assessments and this could be explored further to improve the matter.</p>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		<p>Recent contract monitoring of the activities undertaken by the CCA role identified that There are several people receiving support from other services such as a care support agencies, another sensory provider or a CPN. Some individuals using the drop-in session already have allocated CCA involvement.</p> <p>Data Return from provider gives Q1-75 and Q2-45 for duty tasks, additional 59 tasks out with duty in Q2.</p> <p>The provider stated in the IIA session that the above stats were not a true representation of what service level is possible through this contract due to lack of staff capacity in place.</p> <p>Provider stated now that appropriate staff are in place there has been a significant increase in the number of tasks completed and has exceeded the quarterly KPI target.</p>
<p>Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.</p>	<p><a href="#">Poverty in Edinburgh – data and evidence, Edinburgh Poverty Commission, 2020</a></p> <p><a href="#">Poverty Commission Edinburgh</a></p> <p><a href="#">VNR0017 - Evidence on Voluntary National Review of UK progress against the</a></p>	<p>Research and publications suggest link between poverty and deafness, with deaf people in Edinburgh and elsewhere facing disproportionately higher rates of poverty and related challenges. These are exacerbated by barriers in accessing employment, education, communication and access to services. This</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p><a href="#">Sustainable Development Goals</a></p> <p><a href="#">Educational outcomes of young people in Scotland who are deaf or hard of hearing. pdf</a></p> <p>AIS case file records detail the nature of the CCA support required. As noted opposite tasks are linked to support with welfare benefits.</p> <p>An example is provided: “People come asking for support with benefits and need one to one support with explaining the processes and due to the language barrier. Deaf Action refer to Citizen Advice Scotland who cannot provide an interpreter. Therefore, Deaf Action CCAs need to deal with the matter. Often, they have missed deadlines or lost their benefit and we help challenge decisions, It is all very confusing, complex and stressful for the deaf person and their families.”</p>	<p>can lead to isolation and potential negative impact on mental health and wellbeing.</p> <p>Contract monitoring return data detailed the range of support provided by CCAs is considered to align with those provided under Housing Support services: Signing on to Universal Credit, understanding letters from UC, PIP, ADP, Housing Benefits. Information about BSL classes, and the Deaf Community, housing repairs, calls to British Gas, Scottish Powers about repairs, meter reading. Support with bus pass, equipment referrals. Signposting non-BSL users to other services. Making phone calls, arranging appointments, emotional support. Support with VISA application, landlord complaints and co-ordinating contact with CPN.</p> <p>CCA support tasks involved an element of support to help BSL users to understand letters, bills and a breadth of information which can be confusing as English is their 2<sup>nd</sup> language. CCAs helped people living with a Learning disability or those who have not had access to the education that they should have had.</p>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		The challenge is other providers and 3 <sup>rd</sup> sector providers do not or cannot provide a BSL interpreter due to not having funding in place to pay for interpreters. They refer deaf/BSL users to the CCCA service.
Data on equality outcomes	<p>Provision relates to <a href="#">Social Work (Scotland) Act 1968</a> legislation (s.12)</p> <p><a href="#">Social Care (Self-directed Support) (Scotland) Act 2013</a></p> <p><a href="#">Equality Act 2010: guidance - GOV.UK</a></p> <p><a href="#">British Sign Language (BSL): national plan 2023 to 2029 - gov.scot</a></p>	<p>Service provision regarding access to assessment is arranged by EHSCP due to delegated functions under adult social care and disability Services.</p> <p>The Equality Act 2010 legislation states “reasonable adjustments” are required by way of providing BSL communication support to access advice, information and signposting in an inclusive manner to promote accessibility, choice and maximise independence.</p> <p>Opinion stated - instead of saying BSL users cannot read and write - we should be saying that some people won't be able to access or understand written English. It is about making sure that services provide information in an accessible format. English speaking people would struggle with some of the formal letters and processes too. There needs to be a route whereby they can get support to complete this kind of documentation.</p>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		<p>Number one priority is that BSL is accessible, it's about making things more visual. Hearing population get information transferred into a plain English document or large print/ different language version. BSL National plan is about public service making information accessible for everybody.</p>
<p>Research/literature evidence</p>	<p><a href="#">British Sign Language Act 2022</a></p> <p><a href="#">BSL Scotland Act 2015 – BSL Scotland Act 2015</a></p>	<p>Adults and children with a sensory impairment should expect seamless provision of assessment, care and support and the same access to employment, education, leisure, healthcare and social care as everyone else. It is set against a background of increasing demand, the requirement for greater efficiency and effectiveness, and Health and Social Care Integration.</p> <p>British Sign Language is formally recognised as a language in England, Wales and Scotland.</p> <p>The Act does not impose duties on councils but issues guidance to departments on how to support and facilitate BSL use, including best practices like interpretation and accessible content (section 3)</p> <p>The BSL (Scotland) ACT does impose a statutory obligation to councils to</p>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
	<p data-bbox="491 636 935 707"><a href="#">Draft City of Edinburgh Council BSL Plan 2024-30</a></p> <p data-bbox="491 1850 807 1886"><a href="#">Contact Scotland BSL</a></p>	<p data-bbox="967 421 1378 631">prepare and implement a BSL Plan, involving public participation across all relevant service and sectors. Alignment with feedback and actions of the Plan.</p> <p data-bbox="967 676 1362 963">Improve the availability and quality of information about services, especially through BSL videos, alternative options for contacting the Council, and increase awareness through promotion.</p> <p data-bbox="967 1008 1382 1733">An opinion was shared that people think that BSL is a signed version of written or spoken English and so subtitles or written English are deemed an adequate alternative for BSL users. This is not the case, particularly for individuals who have been deaf from birth or early childhood. This means that BSL users can face barriers as a direct result of being excluded from communication and this can have negative impacts on every aspect of their life, including education, employment, and access to healthcare. Examples given</p> <p data-bbox="967 1778 1385 1957">24 hours/7 days a week. Live BSL video interpreting available all year. VRS for all. Free calls to anyone from anywhere in Scotland.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p><b>Video Relay Service (VRS)</b></p> <p><a href="#">Relay UK - homepage   Relay UK</a></p> <p><b>Video Remote Interpreting (VRI)</b></p> <p><a href="#">Video Remote Interpreting Services - LanguageLine UK</a></p> <p><b>Key Differences</b></p> <p><b>Location:</b> In VRI, the deaf and hearing individuals are usually in the same location, while in VRS, they are typically in different locations.</p> <p><b>Purpose:</b> VRI is often used for more formal or professional settings, while VRS is used for everyday communication, like phone calls.</p> <p><b>Funding:</b> In some countries, VRS is funded by the government or telecom providers, while VRI is often paid for by the organisation or individual requiring the service.</p> <p>Both services rely on video technology and interpreters to bridge the communication gap between deaf and hearing individuals, but they cater to different communication needs and scenarios.</p> <p><a href="#">The operation of the Public Sector Equality Duty in Scotland - Scottish Parliament - Citizen Space</a></p>	<p>Contact Scotland BSL is not there to replace interpreters but to have in addition too. There needs to be other options on offer to people too such a VRS and VRI to access remote interpreters. We need to highlight there are other professionals offering support too.</p> <p>These are video-based communication services that facilitate interaction between deaf or hard-of-hearing individuals and hearing individuals. However, they serve different purposes and operate in distinct ways.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p><a href="#">Scottish Ethnic Minority Deaf Charity: Healthy Deaf Minds Project</a></p>	<p>PSED needs to be included as evidence too to show wider resources need to be accessible and inclusive.</p> <p>“A proposal for an inclusive communication regulation has been revised to ensure legislative competence and a new approach agreed. Scottish Government officials will be trained in better inclusive communication practices. Officials will also assess existing guidance and materials on inclusive communication. Ministers will be able to use their powers to draw listed public authorities' attention to these materials”.</p> <p>Working with deaf adults and families from another country and culture re processes and services to navigate the pathway is essential to help them get the support they need. International sign is a challenge. An experienced deaf person in international sign is needed. Scottish Ethnic Minority Deaf Charity is available to offer support.</p>
Public/patient /client experience information		<p>Strong opinion shared that client experience information is vital as deaf people have negative experiences and it's important to capture their perspective. It is also Important to gather lived experience of the CCA remit. Surveys need made into an</p>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		<p>Easy Read version. A previous engagement did mean people came into the CCA service to get help completing their surveys to gain their views objectively.</p> <p>Opinions were shared that engagement and experience information were gathered in relation to a previous IIA recently (June 2024) and highlights the same/similar issues raised in this IIA session. Details were cross referenced with other IIA</p>
<p>Evidence of inclusive engagement of people who use the service and involvement findings</p>	<p>Statement from provider service:  For the record an IIA was done for the cessation of the SW service, and we did get many clients come to that and made their views known. Nothing will be any different for the potential cessation of the CCA service.</p> <p>What happened to the original IIA information that was collated? as it would have ticked off all these boxes.</p> <p>Whilst we should get people who benefit from the service to be part of the IIA, they were before for the SW service – and the SW service stopped.</p> <p>We need to think about how we communicate to people, how we use the data that they provide and what we do with it, do we really listen or is a decision been made before the IIA?</p> <p>It is making sure people understand what it is we are</p>	<p>Opinions were shared that engagement and experience information were gathered in relation to a previous IIA recently (June 2024) and highlights the same/similar issues raised in this session. Details were cross referenced with other IIA.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>going through, what it is the council are going through in making their decision.</p> <p>Some attendees shared concerns about inviting people back to yet another IIA, asking the same questions but about the CCAs. The value of the CCA was discussed at the last IIA too. Things we have heard before as it wasn't too long ago.</p> <p>"we need to be thoughtful about asking people to contribute again". It is important that people's views are gathered in whatever way they can contribute".</p>	
Evidence of unmet need	<p><a href="https://www.scotlandscensus.gov.uk/2022-results/scotland-s-census-2022-ethnic-group-national-identity-language-and-religion/">https://www.scotlandscensus.gov.uk/2022-results/scotland-s-census-2022-ethnic-group-national-identity-language-and-religion/</a></p>	<p>BSL users face barriers with interacting in daily life and accessing support due to communication difficulties in accessing and understanding information, making informed decisions and using local services. The following factors are fundamental challenges:</p> <ul style="list-style-type: none"> <li>• a shortage of information and services in BSL format -BSL videos</li> <li>• a shortage of support services who provide staff who can use BSL</li> <li>• general lack of deaf/BSL awareness and an insight into the deaf community</li> <li>• a shortage of qualified interpreters</li> </ul> <p>The most recent contract monitoring data return showed that 5 of 11 people</p>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		supported have no formal support package. Mainstream provision such as Tier 1 housing support providers are unlikely to be able to provide communication support with correspondence for BSL users which this service does provide.
Good practice guidelines	<p data-bbox="491 786 911 891"><a href="http://www.gov.scot">British Sign Language (BSL): national plan 2023 to 2029 - gov.scot (www.gov.scot)</a></p> <p data-bbox="491 1077 938 1223"><a href="https://orb.edinburgh.gov.uk/health-social-care/sensory-support-deaf-blind-partially-sighted">https://orb.edinburgh.gov.uk/health-social-care/sensory-support-deaf-blind-partially-sighted</a></p> <p data-bbox="491 1592 922 1664">CCAs are up to date with ASP level 2 training.</p>	<p data-bbox="965 786 1374 1037">The Scottish Government's new National Plan for British Sign Language, 2023-2029, aims for Scotland to be the best place in the world for BSL signers to live, work, visit and learn.</p> <p data-bbox="965 1077 1378 1514">Both the EHSCP internal orb and website provide updates on any changes to services and current situation along with information on what support services and resources are available for people living with sensory loss. This includes opportunities for Social Care staff to complete Deaf Awareness training.</p> <p data-bbox="965 1554 1385 1883">Deaf Awareness training was delivered in December 2024 to staff within locality teams in Deaf Awareness and the requirement to arrange BSL/English interpretation, how to book an interpreter and how to work with interpreters.</p> <p data-bbox="965 1883 1385 2024">This was actioned December 2024 to ensure that staff are aware of the new way of delivering social work</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>External supervision provided to Deaf Action staff and regular contract monitoring communication with EHSCP</p> <p>Monitor and improve effective communication when required</p>	<p>assessment and care management to deaf BSL users, the role of the CCAs at Deaf Action, and the importance of ensuring that full communication is established through use of BSL/English interpreters for meetings and Contact Scotland BSL to relay short telephone calls.</p> <p>Completed March 2025</p> <p>Provider stated that the CCA service do receive external supervision by a qualified Social Worker on an ad hoc basis depending on need and what guidance is needed. Provider is in regular contact with EHSCP contracts team and they are good at turning things with processes around responding very quickly. Its more about understanding how the CCAs can work to their best advantage with a generic social worker to provide an assessment giving the very specific lived experience of deafness input. Also to carry out reviews independently where it is within their remit. ASP matters will be re- referred to Council immediately.</p> <p>An opinion was shared that there is always more than can be done to make sure there is effective communication with external</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>Potential to link in via Team meetings to remain updated on changes and to ensure effective recording is in place.</p> <p>Potential to link in with the new EHSCP review team.</p>	<p>links to make sure they are there and things run ok.</p> <p>An opinion was shared that the EHSCP restructure has created a huge change so now part of care assessment and management team and have regular staff meetings. A suggestion could be to invite the provider organisation along. A piece of work is being done to create a template to record information on the system to ensure reviews are being done properly. It may be good for Deaf Action to be updated with this given they have access to AIS case file recording.</p> <p>An opinion shared that there is a new review team now in place within EHSCP and there could be an opportunity once they are operational for Deaf Action to link in.</p>
Carbon emissions generated/reduced data	N/A	
Environmental data	N/A	
Risk from cumulative impacts		<p>There are currently other contracts potentially undergoing change within Edinburgh Health and Social Care Partnership. Whilst there is nothing specific affecting targeted services for the deaf</p>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		<p>community, there may be impact from these changes.</p> <p>Opinions were shared that the end of this contract may impact upon the other Lothian Partnerships as to the future sustainability of the service being provide across the Lothians.</p>
Other (please specify)		
Additional evidence required	<p>Opinions within group discussion stated that further evidence was required from;</p> <p>Service monitoring data or case studies to demonstrate work done with some of the protected characteristics.</p> <p>Clients who have experience of using the CCA service</p> <p>Staff who can evidence how clients have specifically benefited from support.</p> <p>A suggestion was made that further insight is required to see how/if the current set up for contacting Social Care Direct by the general public can be replicated for deaf people.</p>	<p>Comments were noted at the IIA session to review new contract monitoring return data as evidence shows significant increase of uptake to service. Provider stated this was due to two new staff being appointed (one beginning June 2025).</p> <p>The provider commented that previous contract monitoring return data was not representative of what they can or are expecting to do within the contract specification.</p>

**8. In summary, what impacts were identified and which groups will they affect?**

<p><b>Equality, Health and Wellbeing and Human Rights and Children’s Rights</b></p> <p><b>The following statements are opinions or beliefs made by those who attended the IIA session</b></p>	<p><b>Affected populations</b></p>
<p><b>Positive</b></p> <p>The Savings and Recovery Programme as a whole will help the EHSCP meet its statutory obligations by ensuring that resources can be prioritised to support the most vulnerable, by delivering efficiencies wherever possible.</p> <p>There are services as part of the council that do and could support BSL users. However, they believe this should be more integrated and should have BSL users at the forefront as members of staff/ workforce.</p> <p>Suggestion was made and supported about having a shopping list to provide a range of wider options of support services so deaf community can access the full support resources that are out there.</p> <p>BDA Scotland have a BSL Helpline for Deaf BSL users in Scotland with support for public services such as councils and NHS related to BSL (Scotland) Act 2015 and BSL National Plan. BDA have strong engagement and collaboration with Deaf community in Scotland and Scottish Government work.</p> <p>Scottish Ethnic Minority Deaf Charity is available to offer support to refugees, asylum seekers and anyone who has moved into Edinburgh who are deaf and BSL users. <a href="#">Scottish Ethnic Minority Deaf Charity: Healthy Deaf Minds Project</a></p> <p>There is already a series of drop-in sessions within the community across Edinburgh to support people who are hard of hearing deaf and facilitated by a range of organisations. These may need promoted more.</p>	<p>People who are deaf and use BSL as their main or preferred language to communicate with others</p> <p>Deaf Refugees, asylum seekers and deaf people who have moved to Edinburgh from abroad</p>



<p><b>Equality, Health and Wellbeing and Human Rights and Children’s Rights</b></p> <p><b>The following statements are opinions or beliefs made by those who attended the IIA session</b></p>	<p><b>Affected populations</b></p>
<p>on their behalf. It is not a face-to-face drop -on to discuss the needs of the deaf person. How can this be replicated for deaf people. There would seem to be a lack of participation and opportunity for them to do this.</p> <p>The CCA service offers a safe environment where they can communicate in their own language. It is important to create a cultural symbiosis. Going in to a council building with no interpreter booked in advance, not able to communicate in their own language or own culture accumulate to no equality of rights and opportunity for the deaf person. They can’t just turn up at a desk and ask for and receive information, so it creates huge barriers. There is no relationship with the person they are trying to interact with. There is no conducive communication and connection. There is an immediate difference in status as it is unlikely that a BSL user will be on the front line to communicate with the deaf person.</p> <p>The service can act as the contact to other services which can provide further support. Without the CCA service, people who are BSL users would find it difficult to make this first contact due to complexities accessing interpreters where and when they need them. Being able to drop-in and discuss openly reduces so much anxiety and stress.</p> <p>Concern in relation to older people and people in their middle years with hearing loss, or developing hearing loss. “.We know the population in Edinburgh is growing exponentially. We know hearing is associated with dementia and that people with hearing problems are 5 times more likely to develop dementia than other people in the general public... are we going to have services there to support these people? Where are they going to go? Who is going to support this population?”</p> <p>We need to acknowledge it is a double whammy if deaf people are isolated and lack confidence to get out of their house and seek support.</p> <p>Ending this contract may be a big impact on young people whose significant adult is a BSL user and if they don’t have access to support them with everyday things such as letters, forms, benefits, welfare etc..</p>	<p>People who use BSL as their primary language of communication.</p> <p>Older people with dementia and hearing loss and younger people with early onset dementia</p> <p>Older people and younger people</p> <p>Young people and children</p> <p>BSL users who do not use technology.</p>

<p><b>Equality, Health and Wellbeing and Human Rights and Children’s Rights</b></p> <p><b>The following statements are opinions or beliefs made by those who attended the IIA session</b></p>	<p><b>Affected populations</b></p>
<p>Deaf Action support deaf parents with understanding the language and jargon in relation to school and their child’s education and to support their child’s rights and support to interact appropriately.</p> <p>Potential child protection issues if adult using BSL cannot get support as a parent/carer.</p> <p>Potential of young person/family falling into poverty or coming under corporate parenting without the relevant support to offer information and guidance.</p> <p>“To my knowledge two thirds of deaf women are BSL users, so there could be a significant impact if they don’t not get the communication support they need”.</p> <p>Every single deaf person who may seek a support service may be affected by the support service ending. Specifically, older people who were supported who don’t have the same access to technology so not able use smart phones, contact BSL, online interpreters etc. People with low income may not afford data or access to smart phones etc and is why they need the support service. They may also have mobility/ physical disabilities and not able to use the drop -in duty session. Having a visiting support service is useful for them.</p> <p>People who are deaf or have hearing loss may be more likely to be impacted by social isolation. Ending the contract could exacerbate any negative feelings and stressors of not having a “go to”. Any problems around welfare and finance could also trigger Mental Health and more complex issues. This could mean a need to escalate a person’s health or social care through hospitals.</p> <p>Being deaf and from another country is going to have a disproportionate effect on someone.</p> <p>Refugees arriving in Edinburgh who rely on International Sign may face significant challenges and opportunities related to their communication and integration. While Edinburgh has a good reputation for</p>	<p>Older people and people living with hearing loss /deaf who may have multiple health issues</p> <p>People who are deaf and have come from abroad and living in Edinburgh</p> <p>Female BSL users</p> <p>Refugees and asylum seekers</p>

<p><b>Equality, Health and Wellbeing and Human Rights and Children’s Rights</b></p> <p><b>The following statements are opinions or beliefs made by those who attended the IIA session</b></p>	<p><b>Affected populations</b></p>
<p>welcoming refugees, specific needs related to sign language, and accessible communication may be overlooked if they do not have this service to access.</p> <p>Refugees who use international sign may encounter significant difficulties in navigating daily life within Edinburgh.</p> <p>Building social connections and participating in community life may be challenging without accessible communication and interpreter support.</p> <p>Organisations and individuals may not be fully aware of the specific needs of refugees who rely on international sign, potentially leading to miscommunication, frustration and not having their needs met.</p> <p>The provider stated that the service can support people who use other languages and who have a different signing language – such as international sign so could be a missed opportunity to help these individuals.</p> <p>The CCA service can act as a transition for people. Some people may enter the country using only international sign. A CCA BSL user can help work through this with the person so they can become more aware of communicating via BSL. If the service is taken away BSL classes and funding for people entering the country may be needed.</p> <p>The CCA service may help these individuals with their socialisation and integration into communities.</p> <p>The service can help navigate people quicker to the most appropriate services and supports they require. Without this service it could delay access to support and may cause escalation for social care input.</p> <p>BSL English interpreters are flagged as being the answer to accessible communication, but that this is not always the case. They can only provide information between one language and another - as a straight forward translation task. But they cannot offer lived</p>	<p>Minority ethnic people (includes Gypsy/Travellers, migrant workers, non-English speakers)</p> <p>Those vulnerable to falling into poverty: eg have low or no wealth, on low income, live in areas of deprivation, experiencing material deprivation (socio-economic disadvantage)</p> <p>People with low literacy/numeracy</p> <p>People in receipt of benefits</p>

<p><b>Equality, Health and Wellbeing and Human Rights and Children’s Rights</b></p> <p><b>The following statements are opinions or beliefs made by those who attended the IIA session</b></p>	<p><b>Affected populations</b></p>
<p>experience as a first language BLS user which involves far greater factors and provides intrinsic support.</p> <p>Without this service, it would need multiple workers to offer the same range of support. Without this input, it creates a far greater cultural divide.</p> <p>People experiencing hardship may not be able to afford data on their phones to make contact, get information or advice, access e-mails or complete documentation from home. The service stated they help people to do this.</p> <p>Edinburgh Council can access interpreters. However, concern was expressed about who would help at the initial point of contact to bridge the gap when people are in immediate need.</p> <p>Removal of service may adversely impact service users financially as the service is used largely for welfare benefits advice (<i>This is not a delegated function to the EHSP</i>). Deaf Action CCAs can refer to the council welfare rights as they can provide ITS. Concern was expressed about who will arrange and set the meeting up and book ITS. Concern was expressed about the quality of other services which may not complete the forms correctly and then deaf people may receive a lower, rather than enhanced level of income.</p> <p>The decision to uphold the proposal may have a wider impact on the other Lothian Partnerships regarding the sustainability of continued service provision. The other partnerships intend to continue to fund the service if financially feasible.</p> <p>Participants expressed that the council process to employ/ book interpreters is a complex system. There are a range of ITS services which participants felt were not fully utilised and there is potential to improve this system and processes.</p> <p>The CCA service provides support to deaf adults with children with autism. They can support the adult to have conversations with education to ensure the young person gets the full support they require and can help</p>	<p>Staff and carers not being able to access or utilise ITS</p> <p>Carers</p> <p>Vulnerable adults and families, those experiencing domestic abuse and involved in the judicial system</p> <p>Adults living with hearing loss/deafness</p>

<b>Equality, Health and Wellbeing and Human Rights and Children’s Rights</b>  <b>The following statements are opinions or beliefs made by those who attended the IIA session</b>	<b>Affected populations</b>
<p>ultimately with positive futures (<i>Children’s and Education services are not delegated to EHSCP</i>).</p> <p>CCA service can help carers find the information they require to support the person being cared for.</p> <p>The service has worked with people experiencing domestic abuse. This may not be disclosed at the first session. As the person builds relationship and trust this can happen. Concern was expressed that this would be adversely impacted by having an intermediary / one-off interpreter.</p> <p>Deaf people who experience breakdown at home may not have adequate access to the person they can trust to give them proper information regarding their safety, and what to expect from services. Moving into supported accommodation, homelessness etc has an impact on supporting a deaf person to understand and navigate these situations. In situations like this the CCA service could link people to the correct team to ensure the person’s safety and a smooth transition.</p> <p>CCA service has supported people through criminal justice through providing a BSL interpreter to explain process, documents etc issued by courts. Courts also pay for interpreters and can get in touch. (<i>Criminal Justice is not delegated to the EHSCP</i>)</p> <p>Service and space offer a safe environment -eliminates discrimination. Anybody experiencing deafness or hearing loss can access it. People can build trust and relationships.</p> <p>As the space is specifically for this service, needs around access are considered as part of the whole culture.</p> <p>The provider considers that the CCA service enables deaf people to be part of society.</p>	

<b>Environment and Sustainability including climate change emissions and impacts</b>	<b>Affected populations</b>
<p><b>Positive</b> People will not be travelling into provider HQ</p> <p>Being able to access digital resources reduces negative environment impact.</p>	
<p><b>Negative</b> People who use BSL may need to travel around the city to access other support services</p> <p>CCA staff may need to travel to each deaf person/people separately.</p> <p>Through the CCA it is one person linking them up in an integrated whole system approach.</p>	

<b>Economic</b>	<b>Affected populations</b>
<p><b>Positive</b> The Edinburgh Integration Joint Board delivering a balanced budget reduces economic pressure on the two funding partners; City of Edinburgh Council and NHS Lothian. This protects the wider services provided by these three organisations.</p> <p>Noted that other health and social care partnership areas have agreed to continue to commission the CCA service.</p>	
<p><b>Negative</b> Disinvestment in service would mean redundancies to current provider staff.</p>	

**9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?**

Edinburgh HSCP commissions services in line with its Strategic Plan, the City of Edinburgh Council’s Procurement Strategy and national good practice. Together, these set out a commitment to equality, human rights (including children’s rights), environmental and sustainability issues.

- 10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.**

As part of the implementation of any change to the Deaf Action Community Care Assistant service, Deaf Action would be required to develop a communications plan to ensure that service users and potential service users would be made aware in BSL via video, and in Plain English, of the changes.

- 11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.**

NO

- 12. Additional Information and Evidence Required**

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

Group asked that further evidence is gathered in regard to service-user feedback on the impact of the CCA service.

- 13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:**

<b>Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)</b>	<b>Who will take them forward (name and job title)</b>	<b>Deadline for progressing</b>	<b>Review date</b>
Create and publish a 'shopping list' of services and supports available detailing the range of resources available with a pathway through council services for BSL users.	Susan Robertson, Commissioning Officer for EHSCP	31 <sup>st</sup> September 2025	30 <sup>th</sup> August 2025

<b>Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)</b>	<b>Who will take them forward (name and job title)</b>	<b>Deadline for progressing</b>	<b>Review date</b>
Review prior deaf awareness training mitigations deployed in 2024 from the cessation of social worker and identify if further requirements are contingent on the ending of the CCA service	Susan Robertson, Commissioning Officer for EHSCP		
If the proposal to end the contract is upheld and exit strategy and communication plan will need to be implemented.	Susan Robertson Commissioning Officer for EHSCP and Deaf Action		

**14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?**

Edinburgh Council can access interpreters however who can help at the initial point of contact to bridge the gap when people are in immediate need?

Consider providing an in- house service that offers a CCA support role for BSL users for the benefits as described in the IIA session. A what else and who else would need to be found to fulfil the current provision.

The council process to book and pay for interpreters is a complex system.

**15. How will you monitor how this proposal affects different groups, including people with protected characteristics?**

**16. Sign off by Head of Service**

**Name**

**Date**

**17. Publication**

Completed and signed IIAs should be sent to:

[integratedimpactassessments@edinburgh.gov.uk](mailto:integratedimpactassessments@edinburgh.gov.uk) to be published on the Council website [www.edinburgh.gov.uk/impactassessments](http://www.edinburgh.gov.uk/impactassessments)

**Edinburgh Integration Joint Board/Health and Social Care**  
[sarah.bryson@edinburgh.gov.uk](mailto:sarah.bryson@edinburgh.gov.uk) to be published at  
[www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/](http://www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/)