

## Equality and Human Rights Impact Assessment (EHRIA) Publication Document

This template summarises the key decisions/actions taken by the SPS in the development of the EHRIA, and has been separated from the full EHRIA document for publication on the SPS external website in compliance with statutory requirements.

<b>Background</b>	
Title of the Policy	Targeted Integrated Case Management
Date EHRIA completed	
Review date and frequency	1 July 2024 and every six months thereafter
Is this a new or revised policy/practice?	New <input type="checkbox"/> Revised <input checked="" type="checkbox"/>
<b>Scoping</b>	
What are the aims of this policy/practice?	
<p>Targeted ICM will complement the existing ICM Guidance Practice Manual 2007 and focuses on identifying and managing the risks of all statutory offenders. Specifically, the annualised case conference model currently used will be replaced with targeted and tiered case prioritisation to ensure that the most appropriate cases are addressed first. The frequency of reviews will be determined by the prisoner's compliance, progress and key milestones. This new process will create efficiency gains for all stakeholders involved in ICM, allowing for any resource savings to be diverted to other case management processes.</p>	
WHO did you consult with?	
<p>The following agencies, groups and individuals were consulted on the development of the Targeted ICM policy and EHRIA:</p> <p>All establishments' ICM teams;  All establishments' Prison Based Social Work (PBSW);  Social Work Scotland;  Risk Management Authority;  Social Work Advisor to Scottish Government;  Head of Risk (S&amp;SE);  S&amp;SE colleagues.</p> <p>Prisoner groups were also consulted. This consisted of visits to HMPs Dumfries, Glenochil, Low Moss and Shotts. Engagement was through a series of focus groups, consisting of a variety of long-term sentence types (Life, OLR, etc).</p>	

## Background

WHAT did you learn?

All stakeholders interviewed recommended a move away from annualised case conferencing. Feedback from ICM teams, Prison Based Social Work and Social Work Scotland from suggested this type of review is ineffective in meeting the needs of people in prison, and tends to duplicate previous work completed, rather than provide clear direction for how each individual should be managed according to their identified risk and pattern of behaviour they are currently exhibiting.

A targeted approach allows for prioritisation and focusing of resources on those individuals who stand to benefit most from enhanced case management. This is a more efficient use of resources and would remove the need for duplication of work which exists presently. Matching the intensity and frequency of case conferences/reviews to the individuals' risk levels is more effective than a one-size-fits-all model of annual case conferences.

If a targeted approach is implemented, it could mean those individuals doing particularly long sentences may not be reviewed via a case conference for up to 5 years (dependant on the outcomes of assessment, their compliance with sentence management & regime, and reaction to interventions).

The benefits of this new, targeted approach will be:

- A holistic initial risk/needs analysis to identify the prisoner's most pressing needs;
- Case prioritisation to ensure that the most appropriate cases are addressed first;
- Progressive support through sentence to provide the prisoner with ongoing support with their prisoner journey;
- Seamless information sharing that ensures that information about the prisoner is shared efficiently and effectively with all partners and agencies;
- Consistent plan of monitoring and reviewing prisoners' Action Plans that are still meeting their needs;
- Efficient and co-ordinated services that ensures prisoners receive the help needed in a timely and co-ordinated way; and
- Improved reintegration outcomes to increase the chances of prisoners being successful in re-integrating into the community following release.

Social Work teams, in particular, could significantly benefit from this new approach. Community Based Social Workers would not have to engage in annual assessments, reviews and attendance at case conferences where the same information is shared and does not provide meaningful consultation with other stakeholders or prisoners. This would allow more time for comprehensive assessments to be carried out and presented more thoroughly when needed. PBSW would be in a similar position where reviews could be carried out at important stages of an individual's sentence and any resource gains could be diverted to improving other prisoner review processes such as Risk Management Team schedules and Parole reviews.

Targeted ICM is likely to improve prisoners' motivation to be involved, give them a voice and sense of ownership in their rehabilitation journey, and increase engagement as it will not be seen as a 'tick box exercise' in managing a process.

## Background

This review, and the subsequent implementation, will provide consistency in the ICM guidance and the information sharing protocols across the establishments which seems to have been diluted since its introduction in 2007. The lack of policy reviews has led to a distortion in the approach used and the information that should be captured regarding an individual's management. The consensus from all stakeholders is that this review and the introduction of the new, targeted approach will result in re-focus on the primary aim of what ICM was originally intended to do.

HOW will this shape your policy/practice?

The new Targeted ICM approach will promote a more strategic, risk-based approach to allocating resources, focusing efforts on those individuals who stand to benefit most.

The emphasis on matching intervention intensity to analysed risk levels rather than blanket standards is aligned with the principles set out in the SPS Corporate Plan 2023-28. As too, are the person-centred principles and involvement of individuals throughout their journey, meaning we treat those in custody as individuals with rights and dignity, and involve them in decision-making about their own care and rehabilitation.

A standardised case management approach, with procedures, templates, and information sharing protocols will enable all establishments to consistently implement the standards outlined in the ICM Practice Guidance Manual 2007 and subsequent targeted guidance.

The continued use of validated risk assessment tools such as LS/CMI and the structured approach of FRAME promotes evidence-based practice. The supplementary guidance also outlines clear safeguarding, consent and information sharing policies essential for ethical practice.

What quantitative and/or qualitative evidence as well as case law relating to equality and human rights have you considered when deciding to develop new or revise current policy/practice?

The new Targeted ICM approach is aligned with the existing ICM Practice Guidance Manual 2007 and maintains all the same standards related to statutory obligations to comply with equality and human rights legislation. The ICM model promotes full assessments for all individuals in order to meet their specific needs i.e. mental health, addiction issues, those at risk of self-harm, learning difficulties, etc. These are captured during initial induction interviews and Core Screen assessments, as well as being continuously reviewed via targeted assessments throughout their custodial sentence. Individualised rehabilitation plans are arranged that consider an individual's unique needs. The person-centred approach outlined in the supplementary guidance to case management aligns with the Equality Act 2010 prohibiting discrimination based on the protected characteristics:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;

<h2>Background</h2> <ul style="list-style-type: none"> <li>sexual orientation.</li> </ul> <p>The guidance emphasises treating prisoners with dignity, compassion and respect.</p> <p>Social Work Scotland’s Codes of Practice emphasises supporting the rights of people who use services to control their lives and make informed choices about the services they use – the targeted ICM guidance mirrors these professional ethics.</p> <p>Overall, the policy guidance considers a range of evidence sources regarding laws and recommendations relating to equality, diversity, and human rights in shaping procedures for respectful, person-centred and effective case management.</p>	
<h2>Impact</h2> <p>Will the impact and outcomes of the new/revised policy/practice:</p>	
<p>Contribute to eliminating discrimination, harassment and victimisation? E.g.</p> <ul style="list-style-type: none"> <li>Raise awareness of our SPS vision and values for equality and diversity</li> <li>Challenge appropriately any behaviours or procedures which do not value diversity and advance equality of opportunity</li> </ul>	<p>POSITIVE: It will contribute to eliminating discrimination, harassment, victimisation <input checked="" type="checkbox"/></p>
	<p>NO EFFECT: It will have no effect on discrimination, harassment and victimisation <input type="checkbox"/></p>
	<p>NEGATIVE: It will make discrimination, harassment and victimisation worse <input type="checkbox"/></p>
<p>Advance equality of opportunity between those who share a protected characteristic and those who do not? E.g.</p> <ul style="list-style-type: none"> <li>Remove or minimise disadvantage</li> <li>Meet the needs of equality groups that are different from the needs of others participation in public life</li> </ul>	<p>POSITIVE: It will advance equality of opportunity <input checked="" type="checkbox"/></p>
	<p>NO EFFECT: It will have no effect on equality of opportunity <input type="checkbox"/></p>
	<p>NEGATIVE: It will reduce equality of opportunity <input type="checkbox"/></p>
<p>Foster good relations between those who share a protected characteristic and those who do not. E.g.</p> <ul style="list-style-type: none"> <li>Tackle prejudice</li> <li>Promote understanding</li> </ul>	<p>POSITIVE: It will foster good relations <input checked="" type="checkbox"/></p>
	<p>NO EFFECT: It will have no effect on good relations <input type="checkbox"/></p>
	<p>NEGATIVE: It will cause good relations to deteriorate <input type="checkbox"/></p>

Background	
Will the policy reduce inequalities of outcome as described within the Fairer Scotland Duty 2018?	It will take steps to reduce socio-economic inequalities. <input checked="" type="checkbox"/>
	It will make no impact on reducing socio-economic inequalities. <input type="checkbox"/>
Will it uphold human rights?	It will uphold human rights articles. <input checked="" type="checkbox"/>
	It will breach human rights articles. <input type="checkbox"/>

Please summarise the results of the Equality & Human Rights Impact Assessment, including the likely impact of the proposed policy/practice advancing equality and human rights.

Positive Impacts
<p>Protected characteristics affected:</p> <p>Targeted ICM will allow for personalised and targeted support for those individuals with specific protected characteristics to ensure their needs are understood and addressed. By promoting consistency and fairness in decision making, the ICM process will help reduce discrimination and bias against those with one or more protected characteristics.</p> <p>ICM is committed to ensuring all individuals have equal access to available services including education, mental health support, healthcare and addiction services, as well as other services to support their rehabilitative needs such as additional interventions, restorative justice, addiction recovery services, counselling, etc.</p> <p>Compliance with policy and legal standards and obligations is acknowledged in the guidance framework and meets the requirements related to non-discrimination and equality, ensuring the rights of individuals are upheld.</p> <p>ICM successfully upholds its commitment to the protected characteristics through adherence with all policy standards and collaboration with external organisations and agencies who observe these standards.</p>

**Negative Impacts**

Protected characteristics affected:

There may be limited opportunity for individuals to address their needs due to perceived acceptance from their peers regarding protected characteristics.

Associated impacts of mental health such as anxiety, depression, etc may led to lack of engagement with processes to help them address their risks and needs.

Impact	Mitigation
There is no evidence of negative impacts but this will be continuously monitored throughout the policy's implementation.	Although there are no current negative impacts, ongoing monitoring will be implemented to mitigate emerging issues and address any problems that may arise.

**Recommended course of action**

<b>Outcome 1:</b> Proceed – no potential for unlawful discrimination or adverse impact or breach of human rights articles has been identified.	<input checked="" type="checkbox"/>
<b>Outcome 2:</b> Proceed with adjustments to remove barriers identified for discrimination, advancement of equality of opportunity and fostering good relations or breach of human rights articles.	<input type="checkbox"/>
<b>Outcome 3:</b> Continue despite having identified some potential for adverse impact or missed opportunity to advance equality and human rights (justification to be clearly set out).	<input type="checkbox"/>
<b>Outcome 4:</b> Stop and rethink as actual or potential unlawful discrimination or breach of human rights articles has been identified.	<input type="checkbox"/>

**Summary of Outcome decision and Recommendations**

No evidence of unlawful discrimination, adverse impact, or breach of human rights has been identified.

**Recommendations:**

The new Targeted ICM approach promotes equality, diversity and human rights by allowing for personalised and targeted support to meet individuals' needs. It upholds standards and obligations related to non-discrimination and equality, ensuring the rights of individuals are protected. Compliance with policy and legal standards is acknowledged to meet requirements related to equality and human rights.

ICM collaborates with external organisations who also observe these standards to successfully uphold its commitment to protected characteristics.

It is recommended to proceed with implementing the new policy.

## Next steps

To ensure equity and non-discrimination, the impact of the Targeted ICM policy on individuals with protected characteristics will be regularly reviewed.

The review will:

- Analyse Targeted ICM engagement data of protected characteristics to assess outcomes such as behavioural changes, custody compliance, progression opportunities and mental health improvements, etc;
- Review ICM documentation to identify participation rates of protected groups;
- Conduct interviews with individuals from protected groups to gather qualitative feedback.

Review Process:

- Regularly analyse data to evaluate policy impacts on protected groups;
- Identify any outcome or satisfaction disparities between groups and investigate causes;
- Develop recommendations to address identified disparities.

Action Plan:

- Implement review recommendations to enhance equity;
- Monitor changes to ensure effectiveness in improving outcomes for protected groups.

If you require this document in an alternative format, please contact [ASKERandR@prisons.gov.scot](mailto:ASKERandR@prisons.gov.scot)