

Equality Impact Assessment Tool

This Tool has been developed to ensure that equalities, human rights, economic, social factors and the Armed Forces Covenant Duty are being considered ahead of the implementation of any new or revised policies, provisions, criteria, functions, practices and activities, including the delivery of services. Please note for the purpose of this document these will be grouped together and simply referred to as ‘**activity**’.

General Information			
Name of activity	Delivery of the national breast screening programme in Dumfries and Galloway.		
Lead person and job title	Regina McDevitt, Consultant in Public Health, NHS D&G		
Contact Information (<i>telephone and/or email</i>)	Regina.McDevitt@nhs.scot 01387 241584; extension 33584	Date of this assessment	December 2025
Names and roles of those involved in the impact assessment process	Regina McDevitt, Consultant in Public Health, (NHS D&G) Kerry Coupland, Screening Programme Manager (NHS D&G) Steven Henderson, Clinical Lead (NHS A&A) Fiona Rowan, Superintendent radiographer (NHS A&A) Thomesena Lochhead, Senior Health Promotion (NHS D&G) Lynne Rush, Consultant in Public Health (NHS A&A) Bobbie Coughtrie, Screening Improvement Manager (NHS A&A) Shona Pearson, Screening Officer, (NHS D&G)		
Describe the activity in no more than 200 words	<p>The national breast screening programme has been in operation in Scotland since 1988. The aim of the programme is to reduce mortality from breast cancer by detecting lesions when they are too small to see or to feel, using special x-rays called mammograms. All women in Scotland between the ages of 50 and 70 are invited for a mammogram every three years. Women older than 70 years can self-refer into the screening programme.</p> <p>Breast screening is delivered by six specialist centres across Scotland. The South West breast screening centre (SW BSC) provides screening for women from Dumfries and Galloway. It is hosted by NHS Ayrshire & Arran and located in Ayrshire Central Hospital (ACH), Irvine, North Ayrshire. Screening is delivered in mobile breast screening vans which are located in community settings across the region on a three-year cycle. Women who screen positive for breast cancer are invited for assessment appointments at the SW BSC in ACH.</p>		
How will people be affected by this activity?	<p>The Healthcare Improvement Scotland (HIS) standards for breast screening (2019) require that services review equality impact assessments, and develop action plans to address any resultant health inequalities in breast screening.</p> <p>The previous local EQIA was undertaken a considerable time ago; national governance arrangements for breast screening have changed significantly and the Covid19 pandemic impacted on all screening programmes, including breast screening.</p> <p>A number of external factors are changing that impact on the breast screening programme. One of the most significant is the increasing trend of GP practices merging, which impacts on the way that women are invited for breast screening. Fail-safes are included in the invitation electronic system to ensure that women</p>		

	<p>do not miss screening invitations but ongoing active vigilance is required.</p> <p>There continues to be differences in breast screening uptake due to a range of characteristics, including socio-economic status, age and ethnicity. All women with a female CHI number, as well as transwomen taking feminising hormones and transmen who still have breast tissue, should be invited for breast screening.</p>
<p>Who has been involved in the development of this activity and in what capacity?</p>	<p>The Breast Screening steering group, which comprises representatives from the SW BSC; NHS D&G and NHS A&A.</p> <p>The Public Health Screening Programme Oversight Group (SPOG) for Dumfries and Galloway.</p> <p>The Public Health Senior Management Team (SMT) for Dumfries and Galloway.</p>
<p>Please include any evidence or relevant information that has influenced the overall decision being considered within this impact assessment</p>	<p>Key performance (KPI) data for breast screening in Dumfries and Galloway is collated and presented to The Public Health Committee (a Board-level governance group) each year in an annual assurance report. This monitors breast screening uptake, including by Scottish Index of Multiple Deprivation (SIMD), which shows that there continues to be a social gradient in screening uptake locally as well as nationally.</p> <p>The SW BSC obtains feedback from women from Dumfries and Galloway each year as part of its participant satisfaction survey, and includes this information in their annual report. Women from Dumfries and Galloway persistently highlight the challenges in having to travel to ACH for post-screening assessment appointments.</p> <p>The Dumfries and Galloway Screening Inequalities engagement programme (SIEP) identified barriers to breast screening as well as enablers to encourage attendance in local women affected by homelessness and by mental health issues. The SIEP findings are the basis for ongoing engagement programme with Third Sector partners and other NHS services in Dumfries and Galloway to raise awareness of breast screening in vulnerable women and the services that support them. The delivery of co-developed screening awareness training to staff and volunteers from local Third Sector partners, as well as to some NHS teams, continues to provide intelligence about factors that encourage or inhibit participation in breast screening.</p>

Impact Assessment Questions

<p>Please complete the table below and outline within the comments sections:</p> <ol style="list-style-type: none"> 1. any evidence, relevant information or involvement that has influenced the decision on impact (this may also include demographic profiles, audits, research, health needs assessment, work based on national guidance, findings from engagement and consultation). Prompts are available on page 6 to support discussion around potential impacts. 2. Mitigating measures that will be taken to ensure that no impact is negative <p>When assessing the impact on each protected characteristic, you should consider the following aims of the Public Sector Equality Duty:</p> <ul style="list-style-type: none"> • Does the proposed activity impact on the elimination of discrimination? • Does the proposed activity contribute towards advancing equality of opportunity by removing or minimising disadvantages, meeting the needs of particular groups and encouraging participation in a particular activity? • Does the proposed activity foster good relations between different groups?

Protected Characteristics/Impact Areas	Are there any positive impacts?	Are there any negative impacts?	Rationale for decision and further comments	What measures will be put into place to mitigate any negative impacts?
<p>Age</p> <ul style="list-style-type: none"> • Early years, children and young people, including care experienced young people • Working aged people • Older People 	Yes	No	<p>Robust scientific evidence was used to set the age-range for women to benefit from breast screening every 36 months at 50-70 years.</p> <p>This national position is reviewed at intervals: there is currently a national UK study investigating the benefits of increasing the upper age limit which will report in the next 3 years.</p>	<p>Women older than 70 years and 364 days can self-refer into the breast screening programme.</p> <p>Women invited to breast screening for the first time, i.e. those aged 50 -53, have a lower uptake than women aged 54 to 70. Additional engagement effort is required for the youngest age-eligible women.</p> <p>Note that there is a completely separate programme of annual breast surveillance screening for younger women (from 20s onwards) at high risk of developing breast cancer either due to having a specific genetic mutation (e.g. BRCA1 or 2) or with a family history of breast cancer in first-degree relatives. This service is not part of the national breast screening programme.</p> <p>Familial breast cancer Right Decisions</p>
<p>Disability (<i>This includes physical disability, learning disability, sensory impairment, long term medical conditions</i>)</p>	Yes	Yes	<p>Women with disabilities tend to face more barriers to participation in screening compared to the general population. The letter that invites women to breast screening in Scotland includes information on obtaining additional support to attend</p>	<p>There is evidence nationally that women with disabilities have lower breast screening uptake rates. National, regional and local mitigations are in place including the following:</p>

<p><i>and mental health conditions)</i></p>			<p>their screening appointment. However, awareness of this flexibility has been reported as being low in national research. Women with learning disabilities have lower uptake of all national screening programmes, including breast screening. This means the risk of cancer being found at a later stage is increased in this vulnerable population. The new annual health assessment (HA) for people with learning disabilities specifically asks a question about participation in screening, and should lead to improvements in breast screening uptake for this population.</p>	<p>Breast screening in Dumfries and Galloway is delivered via mobile screening units. Unfortunately, these cannot accommodate women using electric wheelchairs. However, there is a pathway in place to ensure women with this type of wheelchair are screened at a static centre.</p> <p>National resources about breast screening are available in British Sign Language, audio description, Video, Braille, Large Print and Easy Read versions to support people with sensory or learning disabilities access breast screening.</p> <p>Breast screening in Scotland NHS inform</p> <p>A new national poster was published in December 2025 with QR code links to videos in BSL, explaining what happens at a breast screening appointment,</p> <p>What to expect at your breast screening appointment language poster-Nov25</p> <p>Bespoke engagement work with the Learning Disability service in NHS D&G was taken forward in March 2025 to raise awareness and provide resources about the different screening programmes, including breast screening. This included what constitutes reasonable adjustments for women with learning disability, such as pre-</p>
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				<p>visits to the screening site, how to re-schedule appointments etc...</p> <p>A dedicated post-holder in the Learning Disability team is working with GP practices across Dumfries and Galloway to support all aspects of the annual health checks, including screening programmes.</p>
Sex/Gender	Yes	No	<p>All age-eligible women in Scotland are invited for breast screening in the national programme.</p> <p>Whilst men can also get breast cancer, the numbers involved are very small at ~400 per year in the UK. There is no scientific evidence that the inclusion of men in the national breast screening programme will reduce mortality from breast cancer in men at the population level.</p>	<p>This is a national screening programme, that is based on scientific evidence in terms of age and sex eligibility to reduce mortality from breast cancer. There are no plans to consider a national breast screening programme for men as there is no clinical, epidemiological or proportionality reasons for so doing.</p>
Gender reassignment and Transgender	Yes	Yes	<p>Transmen who retain breast tissue and transwomen who take hormone replacement therapy have a lower risk of developing breast cancer compared to women assigned as female at birth. However, they still have some risk and are therefore also invited for breast screening in the national programme.</p> <p>There is evidence that trans people have lower rates of engagement with breast screening services, due to a lack of awareness of their risk factors for breast</p>	<p>There is evidence nationally that transgender and non-binary people have lower breast screening uptake rates. National and local mitigations are in place including the following:</p> <p>NHS Inform contains specific guidance about breast screening for trans and non-binary people.</p> <p>Transgender screening in Scotland NHS inform</p> <p>Screening Awareness training has been delivered to the local Third Sector Organisation 'LGBT Plus'. This is the</p>

			cancer and/or being eligible for breast screening. In addition, transpeople can face barriers to engaging with health services in general due to concerns about stigma, dysphoria and privacy when accessing breast screening services.	supportive community for LGBT Plus community and their families across Dumfries and Galloway, which includes transpeople. This training aims to support staff and volunteers from LGBT Plus to plan to have informed, supportive conversations about breast screening with the people they support. The training package contains specific information for transpeople, as well as signposting to national resources, about breast screening. The aim is to provide reassurance to trans men and trans women in the region that they are entitled and welcome to access breast screening services.
Marriage and Civil Partnership	Yes	No	All age-eligible women in Scotland are invited for breast screening in the national programme, irrespective of marital status, or whether in a marriage or civil partnership.	NA
Pregnancy and Maternity	No	No	Pregnant women and those who have recently given birth are not generally age-eligible to participate in the national breast screening programme.	NA
Race (<i>includes Gypsy/Travellers and those whose first language is not English</i>)	Yes	Yes	The ethnic profile of the Dumfries and Galloway population is changing, with greater diversity being evident due to evolving migration patterns. Information on breast screening is available in a range of	There is evidence nationally that people from minority ethnic groups have lower breast screening uptake rates. National and local mitigations are in place including the following:

			<p>languages to support women whose first language is not English to consider participation in breast screening in an informed way.</p> <p>Women from Gypsy/Traveller communities are invited for breast screening. There can be challenges where women are not registered with a GP.</p>	<p>Language Line interpreter services can be deployed locally to support breast screening and assessment appointments in a range of languages.</p> <p>National resources about breast screening are available in 19 languages, including Roma.</p> <p>Breast screening in Scotland NHS inform</p> <p>A new national poster was published in December 2025 with QR code links to videos in the six most translated languages (and BSL) explaining what happens at a breast screening appointment,</p> <p>What to expect at your breast screening appointment language poster-Nov25</p> <p>Work is underway in D&G to engage better with gypsy / traveller community via dedicated Health Visitor to raise the profile of breast screening and improve acceptance of screening invitations. Reassurance was obtained that most gypsy/traveller families in the region are registered with a GP, which would facilitate participation in screening.</p>
Religion or belief	Yes	Yes	<p>All age-eligible women are invited for breast screening, irrespective of religious or spiritual belief.</p> <p>Research in Scotland in 2020 indicated that some women from certain religious-cultural</p>	<p>There is evidence nationally that people with varying religious-cultural ethnicities have lower breast screening uptake rates. National and local mitigations are in place including the following:</p>

			<p>backgrounds do not accept an invitation to breast screening due to concerns about modesty: being partially dressed for the mammogram and that the mammographer might be male. The latter is unfounded as all mammographers in Scotland are female, which is stated in breast screening information leaflets. However, additional reassurance needs to be provided to women that this is the case.</p> <p>Your breast screening explained</p>	<p>New national-level produced videos in the six most translated languages are being promoted in December 2025 that explain what happens at a breast screening appointment. These are expected to allay concerns described for women from certain religious-cultural backgrounds.</p> <p>What to expect at your breast screening appointment language poster-Nov25</p> <p>Efforts are underway locally to engage with members of the black and minority ethnic NHS staff group and a community support group to deliver co-developed training about screening, including breast screening. There may also be opportunities to undertake some focussed engagement work with women from minority ethnic backgrounds in 2026/2027.</p>
Sexual orientation	Yes	Yes	<p>All age-eligible women are invited for breast screening, irrespective of sexual orientation.</p> <p>However, there is growing evidence suggesting lesbian and bisexual women are at increased risk of developing breast cancer due to interactions between: delayed/no child birth, no breast feeding, less breast self-examination and increased rates of smoking, alcohol consumption and/or being overweight.</p>	<p>National and local mitigations are in place to ensure equal access to breast screening information and support.</p> <p>Local mitigations include that Screening Awareness training has been delivered to the Third Sector Organisation 'LGBT Plus' in Dumfries and Galloway. This is the supportive community for LGBT Plus community and their families across the region. This training aims to support staff and volunteers from LGBT Plus to plan to have informed, supportive conversations</p>

			<p>Lesbian and bisexual women are also reported to have lower rates of breast screening uptake. This has been reported to be due to concerns about stigma in healthcare settings, being treated differently to heterosexual women and perceived lack of privacy when accessing breast screening services.</p> <p><u>References</u> 2023 Mar 29;15(7):2031. doi: 10.3390/cancers15072031 2015 Sep-Oct;65(5):384-400. doi: 10.3322/caac.21288.nihms723706.pdf</p>	<p>about breast screening with the people they support. The aim is to provide reassurance to lesbian and bisexual women in the region that they are entitled to access breast screening services, and should be supported to do so.</p>
Human Rights	Yes	No		
Carers	Yes	Yes	<p>Women who are carers are age-eligible for breast screening, but may struggle to attend any health appointment due to caring responsibilities.</p>	<p>There is local anecdotal evidence that some women who are carers have lower breast screening uptake rates.</p> <p>Some local mitigations are in place including that local engagement with a range of stakeholders included the delivery of screening awareness training to the Carers Network D&G. This network now includes a standard question about screening participation in the annual support plan put in place with each carer. This should encourage supportive conversations</p>

				about breast screening with carers, and support informed choice about participation.
Staff: <ul style="list-style-type: none"> • Full time • Part time • Shift workers • Staff with protected characteristics • Staff vulnerable to falling into poverty 	Yes	No	NHS staff may be affected by challenges outlined in this EQIA, e.g. for Poverty at-risk; sexuality; gender reassignment, etc.	<p>Local work to raise awareness about breast screening for people with protected characteristics and work to improve transport options for post-screening assessment appointments should also be beneficial for NHS staff.</p> <p>NHS Staff are entitled to use Special Leave policy to attend medical appointments, which should facilitate attendance at breast screening appointments.</p>
Poverty ‘at risk’ groups <ul style="list-style-type: none"> • Unemployed people • People on benefits • Pensioners • Care Experienced people • Those living in the most deprived communities • Remote rurality 	Yes	Yes	<p>There is a strong social gradient in breast screening with 60% of women from the most-deprived quintiles participating compared to 80% of women from the least deprived quintiles. This trend is observed locally and nationally.</p> <p>The mobile units deliver breast screening across a range of Dumfries and Galloway communities and thereby take the service close to most women in the region, reducing travel costs. However, post-screening assessment appointments for a proportion of women take place in the SW BSC at ACH, Irvine, which is the centre of excellence for post-screening assessment. Women from D&G have persistently raised issues about the inequity this presents, where they have to travel between 70-120</p>	<p>Significant efforts have been made locally and nationally to reduce the gap in breast screening uptake between women from the most-deprived and least-deprived communities. However, this gap stubbornly remains. A programme of local engagement with Third Sector stakeholders, and a number of NHS and HSCP services, aims to increase breast screening uptake in the most vulnerable women across the region.</p> <p>The SW BSC schedule assessment appointments for women from D&G from 11 am onwards to facilitate travel arrangements.</p> <p>Where women indicate that they encounter significant travel issues due to cost, or time taken to travel by public transport or to an</p>

			<p>miles over 3-4 hours each way, and may incur costs due to having to take time off work or pay to cover for caring responsibilities. This has a disproportionate impact on women from lower income backgrounds.</p>	<p>unfamiliar site > 70 miles away, the SW BSC contacts Public Health, NHS D&G to arrange for patient transport by exception. However, such arrangements are very expensive and unsustainable currently as this requires the use of private taxi. A programme of work is underway in NHS D&G to commission services from a community transport hub and develop a sustainable transport option for women unable to travel for post-screening assessment for reasons of cost.</p> <p>The national breast screening information leaflet and invitation letter make it clear that support with transport costs is available for some women in receipt of certain benefits and/or on low incomes.</p> <p>Your breast screening explained</p>
<p>People with low literacy/numeracy, poorer skills and/or attainment</p>	<p>Yes</p>	<p>No</p>		<p>National resources about breast screening are available in Easy Read format, as well as in Audio format and video format. Local engagement work has sign-posted these alternate formats to Third Sector organisations and NHS teams supporting vulnerable people in the community.</p> <p>Breast screening in Scotland NHS inform</p>

Those involved in the criminal justice system and their families	Yes	No	Women involved in the criminal justice system will still be invited for breast screening if they are resident in a women's prison.	There is no women's prison in Dumfries and Galloway. However, screening staff attended a Prison Health & Wellbeing day in February 2025 for members of the local prison population to raise awareness about all population screening programmes, including breast screening. Screening awareness training is planned for prison healthcare staff in 2025/2026, which will include the provision of resources to support conversations about screening.
Homelessness	Yes	Yes	Women affected by homelessness may have to move house unpredictably and suddenly, which may affect their receipt of their breast screening invitation letter, which is based on GP lists.	Significant efforts have been made locally to increase opportunities to participate in breast screening for women affected by homelessness. A programme of local engagement with Third Sector stakeholders, including local housing associations, and a number of NHS and HSCP services, aims to increase breast screening uptake in the most vulnerable women across the region.
People who are displaced incl. refugees & asylum seekers	Yes	No	Women who have moved to Dumfries and Galloway as part of refugee settlement programmes are registered with a GP to access health services, including breast screening.	Breast screening information is available in a range of languages, including Ukrainian, Pashto and Arabic, which should meet the information needs of the people involved in the recent re-settlement programmes.
Economic & Social Sustainability	Yes	No	Short-term Scottish funding was obtained to fund <i>ad hoc</i> travel costs for women unable to bear upfront travel costs to ACH	Work is underway in Dumfries and Galloway to commission subsidised travel from community transport groups. This travel will be available to women who need to travel to

			for assessment appointments. This is not sustainable.	ACH for post-screening clinical assessment. This is a more sustainable transport option, which is still under development but may become available in 2026.
Environmental	Yes	No		Breast screening is delivered to women across the region using mobile screening units which brings the service into womens' communities. The screening appointment has to be undertaken in person. As well as increasing access to breast screening opportunities, this reduces travel requirement across the region as a whole. Some women living in remote or rural locations have to travel to the mobile sites. And there is additional travel, by car or public transport, for a proportion of screened women to Irvine, North Ayrshire, for assessment appointments which must be undertaken in person.
Armed Forces Personnel and Veterans	Yes	No	All age-eligible women in Scotland are invited for breast screening in the national programme, including those who have served in the Armed Forces and/or who are veterans.	Additional community engagement work is planned with long-established veterans groups in Dumfries and Galloway in 2026 to raise awareness of all screening programmes, including breast screening.

Does this activity require consideration of the Fairer Scotland Duty? If yes, please outline the steps taken to meet the needs of the duty.	No. In undertaking this EQIA, consideration of the Fairer Scotland Duty has been met.
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Please indicate how are you ensuring the information about the activity and around the proposed changes is accessible in terms of communication in the following formats, where relevant:	Easy Read	NHS Inform
	British Sign Language	NHS Inform
	Alternative Languages	NHS Inform
	Large Print	NHS Inform
	Other (please specify)	Videos, Audio accounts on NHS Inform

Summary Sheet

Name of Activity	Breast Screening programme delivery in Dumfries and Galloway	
Date of Impact Assessment	Commenced February 2025, published December 2025	
Key Lead Contact	Regina McDevitt, Consultant in Public Health	
Please summarise any identified negative impacts and associated mitigations/actions:		
Negative Impact	Mitigation/Action	Responsibility/ Timescale
Poverty at-risk people face up-front costs to travel for post-screening assessment appoints at ACH, in Irvine.	<p>A process is in place whereby the screening centre will identify women affected by travel concerns to NHS Dumfries & Galloway, who arrange transport support on a case-by-case basis.</p> <p>A sustainable commissioned transport service is being developed for people in Dumfries and Galloway for the long term. This should provide subsidised travel for women across the region to complete the screening pathway.</p>	<p>Screening Centre & NHS D&G – Complete</p> <p>General Manager, Community Health & Social Care - expected in 2026/27</p>
All areas with potential negative impact	<p>The Breast Screening Steering Group and the Public Health Screening Programme Oversight Group (SPOG) will monitor the mitigations in place locally via the local breast screening improvement plan.</p> <p>The national Breast Screening Programme Board is responsible for oversight and governance of breast screening inequality and national mitigations that are in place or planned.</p>	<p>Breast Screening Steering Group SPOG</p> <p>National Breast Screening Programme Board</p>

Monitoring

How will you monitor the ongoing impact of the activity on all population groups?	<p>Screening inequity in breast screening is monitored locally at the quarterly Breast Screening Steering Group. An annual breast screening assurance report is developed by the group, which reports specifically on breast screening uptake by multiple-deprivation group and on all projects to reduce inequality in breast screening in Dumfries and Galloway. This assurance report is provided to the Board-level governance group, the Public Health Committee, for monitoring of progress.</p> <p>The challenge of reducing inequity in breast screening in the region, particularly that due to transport costs, is also reported to the Board's Cancer Strategy Group on a quarterly basis.</p>
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	The national Breast Screening Programme Board is responsible for oversight and governance of breast screening inequality and national mitigations that are in place or planned.
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Next Steps in the Impact Assessment Process

When complete, the lead person should send a copy of the full Impact Assessment Tool to the Equality and Diversity Lead by emailing it to dg.cbsteam@nhs.scot.

The impact assessment will then be published on the NHS Dumfries and Galloway public website at www.nhsdg.co.uk.

Please take 5 minutes to share your experience of completing this Impact Assessment by completing [this short survey](#)

Please note that this is a legal document stating that you have fully considered the impact on the protected characteristics and is open to scrutiny by service users/external partners/Equality and Human Rights Commission.