

Equality Impact Assessment Tool

As part of the Health Board's Public Sector Duty under the Equality Act (2010), the Health Board must show it has given 'due regard' to Equality in its decision making processes. This involves assessing the impact of its decisions, policies, and procedures on individuals with 'protected characteristics' as identified in the Act.

Protected characteristics include age, race, gender, gender reassignment, sexuality, disability, religion, marriage and civil partnership, pregnancy and maternity. From April 2021 in Wales, we will also be asked to consider socio-economic disadvantage.

It is our legal responsibility to do this, it is not optional. This document provides a process for Equality Impact Assessment and includes guidance at each stage.

The Equality team can support and advise on this process; please contact ctm_equality@wales.nhs.uk

General Considerations

- EIAs should be carried out by those responsible for developing the policy/service development as they are the most familiar with the detail, and best able to identify how the policy/service development could be modified to avoid or mitigate any negative consequences.
- EIA is a process, not just a form filling exercise. It should be a part of policy or service development from the start, and constantly updated and revisited.
- It is essential that this is an evidence based process and full account should be taken of workforce, local and national evidence and how this data is relevant to the policy/service development.
- All relevant parties should be involved from within and outside the health board. This may include service leads, staff, patients and particularly representatives of protected groups e.g. staff networks and patient panels, local and national organisations which represent protected groups.
- All discussion and decisions must be reflected in the form.

Section 1 – Preparation		
1.	Title of Policy/service	Pharmaceutical Needs Assessment (PNA)
	Is this a new policy/service or a policy/service change?	New Policy
2.	Policy/Service Aims and Brief Description	Welsh Government has changed the way in which applications from pharmacies, dispensing appliance contractors and dispensing doctors provide pharmaceutical needs assessments. The NHS (Pharmaceutical Services) (Wales) Regulations 2020 came into force on 1st October 2020 and place a statutory duty Health Board to publish its first PNA by 1st October 2021. From 1st October 2021, Health Boards will need to use the published PNA when determining applications from pharmacies, dispensing appliance contractors and dispensing doctors to provide pharmaceutical services under these regulations.
3.	Who Owns/Defines the Policy/Service? -	CTMUHB has set up a steering group chaired by the Director of Primary Care, Community and Mental Health with representatives from Hospital Pharmacy & Medicines Management Service, Public Health, LMC, Finance, Planning, CHC, Community Pharmacy Wales also support by PCC CIC (who are a company of experience of drafting PNAs in England)

Section 1 – Preparation		
4.	Who is Involved in undertaking this EqIA?	In developing the PNA, several sources of information were used to gain an overview of the demographic characteristics and the health profile of Cwm Taf Morgannwg University Health Board residents to determine their pharmaceutical needs. This information was analysed by the 8 clusters within CTMUHB. These eight clusters work closely with the three Borough Councils or local authorities and mapping information reflects this. The views of residents on their use of pharmacies and dispensing doctor practices, and information provided by contractors which could not be nationally sourced, was obtained through the use of surveys (chapter one). The information gained was used, in conjunction with other data sources, to inform the PNA. The Steering Group has signs off of this document and final agreement is via Management Board
5.	Other Policies and Services -	The PNA is a statutory document required by the NHS (Pharmaceutical Services)(Wales) 2020
6.	What might help/hinder the success of the policy/service?	The Steering Group has been established and PCC CIC are writing the PNA therefore project timelines are monitored and reviewed

Section 1 – Preparation		
7.	Is the policy/service relevant to “eliminating discrimination and eliminating harassment?”	There has been a patient and public survey that was been advertised via social media for input from the public. This was available from 21 st December until end of January and resulted in 637 responses which have been analysed.
8.	Is the policy/service relevant to “promoting equality of opportunity?”	The PNA will look at the health needs to the Health Board’s population and the provision of pharmaceutical services within the area. The PNA will identify any gaps in provision of pharmaceutical services now and in the lifespan of the PNA. Pharmacy contractors provide three types of service that fall within the definition of pharmaceutical services and the community pharmacy contractual framework and they are essential, advance and enhanced services. These are mapped as part of the PNA indicating availability of services to the population.
9.	Is the policy/service relevant to “promoting good relationships and positive attitudes?”	The gaps will be identified as current and future needs for pharmaceutical services

Section 2. Impact

Please answer the following.

Consider and refer to the information you have gathered from census data, relevant organisations and groups, staff groups, individuals etc. Please indicate the likelihood and risk associated with the issues raised. Some examples have been given against each category but this is not exhaustive and you may identify other issues.

PLEASE INCLUDE RELEVANT DATA FOR EACH GROUP E.G. IF YOU ARE AWARE OF YOUR POLICY OR SERVICE BEING RELEVANT TO PARTICULAR GROUPS E.G. IF IT IMPACTS ON OR IS LIKELY TO BE USED OR RELEVANT TO OLDER PEOPLE, ADD STATISTICS IN RELATION TO STAFF AND OR LOCAL POPULATION. USE NATIONAL STATISTICS WHERE RELEVANT

Do you think that the policy/service impacts on people because of their age? (This includes people of any age but typically focusing on children and young people up to 18 and older people over 60)

- The PNA covers the location of pharmaceutical services and identifies the provision in clusters
- The younger and older population are more likely to use public transport and the document identifies the travel time and distance to each pharmacy
- 634 responses to the patient/public survey were over 16 years old. Half the respondents were between 45 to 64 years
- The survey raised the question of travel time to pharmacies and one comment received that an individual needed to catch two buses. This information will be considered if an application for new pharmacy opening is received

Do you think that the policy/service impacts on people because of their disability? (This includes sensory loss, physical disability, learning disability, some mental health problems, and some other long term conditions such as Cancer or HIV)

- The PNA lists provision of pharmaceutical services and range of services provided

Does the policy impact on people because of their caring responsibilities?

- The document scopes local services and sharing of opening hours including weekends
- The patient/public survey 19% indicated they collected a prescription for others

Do you think that the policy/service impacts on people because of Gender reassignment? (This includes all people included under trans* e.g. transgender, non-binary, gender fluid etc.)

- The PNA indicates provision Pharmaceutical Services by cluster and area linked to GP surgeries. Also opening hours of Pharmacies over 7 days

Do you think that the policy/service impacts on people because of their being married or in a civil partnership?

- No impact was identified on individuals this particular group

Do you think that the policy/service impacts on people because of their being pregnant or having recently had a baby? (This applies to anyone who is pregnant or on maternity leave, but not parents of older children)

- Local Pharmaceutical services mapped to identify travelling times
- In the patient/public survey one person commented 'Since having a baby I have used the pharmacy for him more frequently' – therefore this is taken into consideration for allocation of services

Do you think that the policy/service impacts on people because of their race? (This includes colour, nationality and citizenship or ethnic or national origin such as Gypsy and Traveller Communities, Welsh/English etc.)

- No impact was identified on individuals this particular group

Do you think that the policy/service impacts on people because of their religion, belief or non-belief? (Religious groups cover a wide range including Buddhist, Christians, Hindus, Jews, Muslims, and Sikhs as well as atheists and other non-religious groups)

- The PNA indicates services that are open 7 days per week in clusters therefore reducing travel. This is information shows availability of pharmacies on certain days and opening hours
- The patient/public survey showed 25% found weekdays most convenient time to access a pharmacy and 11% found weekends more convenient

Do you think that the policy/service impacts on men and women in different ways?

- No impact was identified on individuals this particular group
- The public/patient survey noted that 84% of respondents were female and 14% were male (2% preferred not to say)

Do you think that the policy/service impacts on people because of their sexual orientation? (This includes Gay men, heterosexual, lesbian and bisexual people)

- No impact was identified on individuals this particular group

Do you think that the policy/service impacts on people because of their Welsh language? (e.g. the active offer to receive services in Welsh, bilingual information etc)

- This would indicate Communities Pharmacies open and contact could clarify if a Welsh speaking Pharmacist is available
- The results of the patient/public survey showed 98% preferred language was English when accessing services at a Pharmacy. Five who responded other, one respondent preferred British Sign Language

- The draft and final PNAs will be published in Welsh and English for consideration

The Welsh government is introducing a new Socio-economic duty which will be effective from April 2021. It will ask us to consider the impact of our decisions on inequality experienced by people at socio-economic disadvantage.

- The PNA will identify areas of need in the community and if a request for a Community Pharmacy to open the PNA will be referenced to ensure that the geographical area requires this

Section 3 Outcome	
Summary of Assessment: Please summarise Equality issues of concern and changes that will be made to the service development accordingly.	Once the PNA is published it will be used by the UHB to determine applications from pharmacies and dispensing appliance contractors who wish to open new premises or relocate existing premises. In addition the PNA will also include services provided by other providers for example hospital and prison pharmacies.
Please indicate whether these changes have been made.	The draft PNA is to published for 60 days through May/June/July and final PNA is being published by 1st October 2021
Please indicate where issues have been raised but the service development has not been changed and indicate reasons and alternative action (mitigation) taken where appropriate.	The draft PNA is reviewed by the Primary Care Pharmacy team and any clarification is requested on any points raised. PNA will also be considered on publication
Who will monitor this EIA and ensure mitigation is undertaken	The Steering Group will monitor the process
Approved by Equality Team	Yes/No SignedA. Pearce..... (Equality Officer) Date.....1-4-2021.....

To be held on Equality /Covid 19 Site	Actioned Yes/No
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