

Equality Assessment

Draft Pharmacy Staffing Levels Guidance

Phase 1 – Pre-Consultation

June 2022

Contents

Section A	Details about the policy/decision to be screened
Section B	Available Evidence
Section C	Analysis
Section D	Record of Screening Decision

Section A Details about the policy/decision to be screened

Title of policy / decision to be screened

Staffing Level Guidance

Brief description of policy/decision to be screened:

(Record whether this is a new policy or revision of existing policy)

New draft policy on Staffing Levels to assist in the continuation of a safe working environment to ensure patient and staff safety.

Aims and objectives of the policy / decision to be screened

This policy aims to establish principles and to embed regulatory requirements to ensure that staffing levels in pharmacies are sufficient to ensure that all legislative obligations, pharmacy contracted services and regulatory obligations can be met, to meet the workload involved in following standard operating procedures and to carry out other work to ensure that workload or working conditions do not compromise patient care or public safety.

Secondly, that all relevant staff must have the appropriate skills, qualifications and competence to carry out their role and, where relevant, supervise the work of another person.

Lastly, that the risks associated with staffing levels and the provision of pharmacy services must be identified and managed through appropriate risk assessment.

Main Stakeholders Affected

Public

Pharmacists

Trainees, Foundation Training Year

Others – please specify

Other policies with a bearing on this policy

Pharmaceutical Society NI Code (Professional standards of conduct, ethics and performance for pharmacists in Northern Ireland) (2016)

Standards for Registered Pharmacy Premises (2018). Legislation provisions have yet to be activated by a commencement order.

Section B Available Evidence

Data Sources (Please list)

Section 75 Category	Details of evidence/information																																
Age	<p data-bbox="507 510 1390 730">During a pre-consultation engagement exercise with stakeholders, the potential effects on the proposed policy on the Section 75 equality categories were discussed. No matters were raised in respect of age. Any potential equality impact will be explored again during the wider consultation. Registrant's Equality Survey 2021-2022 (n=850)</p> <table border="1" data-bbox="727 763 1171 1256"> <tbody> <tr> <td>under 25</td> <td>5.53%</td> </tr> <tr> <td>25 - 34</td> <td>33.29%</td> </tr> <tr> <td>35 - 44</td> <td>31.53%</td> </tr> <tr> <td>45 - 54</td> <td>19.29%</td> </tr> <tr> <td>55 - 64</td> <td>8.24%</td> </tr> <tr> <td>65 - 74</td> <td>1.88%</td> </tr> <tr> <td>over 75</td> <td>0.24%</td> </tr> </tbody> </table> <p data-bbox="683 1330 1214 1368" style="text-align: center;">Northern Ireland Population Statistics</p> <table border="1" data-bbox="727 1402 1171 2033"> <tbody> <tr> <td>0-4</td> <td>5.98%</td> </tr> <tr> <td>5-9</td> <td>6.54%</td> </tr> <tr> <td>10-14</td> <td>6.67%</td> </tr> <tr> <td>15-19</td> <td>5.95%</td> </tr> <tr> <td>20-24</td> <td>5.85%</td> </tr> <tr> <td>25-34</td> <td>26.77%</td> </tr> <tr> <td>35-44</td> <td>13.11%</td> </tr> <tr> <td>45-54</td> <td>13.27%</td> </tr> <tr> <td>55-64</td> <td>12.73%</td> </tr> </tbody> </table>	under 25	5.53%	25 - 34	33.29%	35 - 44	31.53%	45 - 54	19.29%	55 - 64	8.24%	65 - 74	1.88%	over 75	0.24%	0-4	5.98%	5-9	6.54%	10-14	6.67%	15-19	5.95%	20-24	5.85%	25-34	26.77%	35-44	13.11%	45-54	13.27%	55-64	12.73%
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Dependents	<p data-bbox="507 607 1390 824">During a pre-consultation engagement exercise with stakeholders, the potential effects on the proposed policy on the Section 75 Equality categories were discussed. One group raised the requirement for flexible working to allow staff to fulfil obligations to dependents, if required. Any potential equality impact will be explored again during the wider consultation.</p> <p data-bbox="507 864 1198 902">Registrant’s Equality Survey 2021-2022 (n=849)</p> <p data-bbox="507 938 1230 976">Personal Responsibility for the care of dependents</p> <table border="1" data-bbox="727 1010 1169 1420"> <tr> <td>A child (or children)</td> <td>49.59%</td> </tr> <tr> <td>A person with a disability</td> <td>3.42%</td> </tr> <tr> <td>A dependent older person</td> <td>4.24%</td> </tr> <tr> <td>None of the above</td> <td>47.59%</td> </tr> </table> <p data-bbox="507 1496 1043 1534">Northern Ireland Population Statistics</p> <p data-bbox="507 1570 1390 1715">The May 2022 Census information release from the 2021 Census comments that the children’s dependency ratio has fallen from 46 children per 100 people of working age (1926) to 30 children per 100 people of working age (2021).</p> <p data-bbox="507 1751 1390 1861">Conversely, the number of people aged 65 and over for every 100 people of working age has risen from 13 (1926) to 27 (2021).</p> <p data-bbox="507 1897 1390 2007">On Census Day 2011, 214,000 people were providing some form of unpaid care, equating to approximately one-in-eight residents in Northern Ireland (12%).</p>	A child (or children)	49.59%	A person with a disability	3.42%	A dependent older person	4.24%	None of the above	47.59%
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	Source: Northern Ireland Census 2011. Census data for 2021 currently not available.												
Disability	<p>During a pre-consultation engagement exercise with stakeholders, the potential effects on the proposed policy of the Section 75 Equality categories were discussed. While no group raised any potential impact on staffing level requirements of disability, the requirements to make reasonable adjustments for both patients and staff with disabilities may impact on the implementation of the proposed policy. Any potential equality impact will be explored again during the wider consultation.</p> <p>For research in this area, see for example, 'Improving pharmacy services for disabled people, their families and carers' a Disability Partnership Pharmacy Project (2016).</p> <p>Northern Ireland Population Statistics</p> <p>Registrant's Equality Survey 2021-2022 (n=850)</p> <table border="1" data-bbox="724 999 1179 1077"> <tr> <td>Disability</td> <td>2.24%</td> </tr> <tr> <td>No Disability</td> <td>97.76%</td> </tr> </table> <p>21.7% of respondents aged 16-64 in Northern Ireland (Apr-Jun 2017) reported a long-term illness and a disability. In the UK, overall the figure was 17.4%.</p> <p>Source: NISRA National Wellbeing Measures.</p>	Disability	2.24%	No Disability	97.76%								
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Marital Status	<p>During a pre-consultation engagement exercise with stakeholders, the potential effects on the proposed policy of the Section 75 equality categories were discussed. No matters were raised in respect of marital status. Any potential impact will be raised again during the wider consultation.</p> <p>Registrant's Equality Survey 2021-2022 (n=849)</p> <table border="1" data-bbox="724 1630 1179 1861"> <tr> <td>Single</td> <td>34.39%</td> </tr> <tr> <td>Married</td> <td>60.78%</td> </tr> <tr> <td>Civil Partnership</td> <td>0.71%</td> </tr> <tr> <td>Separated</td> <td>1.3%</td> </tr> <tr> <td>Divorced</td> <td>2.47%</td> </tr> <tr> <td>Widowed</td> <td>0.35%</td> </tr> </table> <p>Northern Ireland Population Statistics</p>	Single	34.39%	Married	60.78%	Civil Partnership	0.71%	Separated	1.3%	Divorced	2.47%	Widowed	0.35%
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Men and Women generally	<p data-bbox="507 611 1198 645">Registrant's Equality Survey 2021-2022 (n=847)</p> <table border="1" data-bbox="724 680 1179 871"> <tr><td>Female</td><td>73.08%</td></tr> <tr><td>Male</td><td>26.92%</td></tr> <tr><td>Transgender</td><td>0.00%</td></tr> <tr><td>Non binary</td><td>0.00%</td></tr> </table> <p data-bbox="507 909 1043 943">Northern Ireland Population Statistics</p> <table border="1" data-bbox="724 981 1179 1059"> <tr><td>Male</td><td>49.19%</td></tr> <tr><td>Female</td><td>50.81%</td></tr> </table> <p data-bbox="507 1097 1059 1131">Source: Northern Ireland Census 2021</p> <p data-bbox="507 1169 1390 1240">A NISRA 2021 report commented that less than 0.1% of respondents reported that they were transgender.</p> <p data-bbox="507 1279 1362 1312">NISRA - Research on Measuring Gender Identity Feb. 2021</p>	Female	73.08%	Male	26.92%	Transgender	0.00%	Non binary	0.00%	Male	49.19%	Female	50.81%
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Political Opinion	<p data-bbox="507 1357 1390 1570">During a pre-consultation engagement exercise with stakeholders, the potential effects on the proposed policy of the Section 75 equality categories were discussed. No matters were raised in respect of political opinion. Any potential equality impact will be explored again during the wider consultation.</p> <p data-bbox="507 1608 1390 1680">No comparable data is available for Pharmacists in Northern Ireland.</p> <p data-bbox="507 1718 884 1751">Northern Ireland Statistics</p> <p data-bbox="507 1792 1390 1899">The May 2022 Northern Ireland Assembly election had the following breakdown of first preference votes based on a turnout of 63%.</p> <p data-bbox="507 1937 1390 2009">First preference vote share after 18 of 18 constituencies declared.</p>												

	<p>Party</p> <table border="1"> <tr> <td>SF</td> <td>29%</td> </tr> <tr> <td>DUP</td> <td>21.3%</td> </tr> <tr> <td>AP</td> <td>13.5%</td> </tr> <tr> <td>UUP</td> <td>11.2%</td> </tr> <tr> <td>SDLP</td> <td>9.1%</td> </tr> <tr> <td>OTHERS</td> <td>15.8%</td> </tr> </table> <p>Source: Northern Ireland Electoral Office.</p>	SF	29%	DUP	21.3%	AP	13.5%	UUP	11.2%	SDLP	9.1%	OTHERS	15.8%																																
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<p>Race</p>	<p>During a pre-consultation engagement exercise with stakeholders, the potential effects on the proposed policy of the Section 75 equality categories were discussed. No matters were raised in respect of race. Any potential equality impact will be explored again during the wider consultation.</p> <p>Registrant's Equality Survey 2021-2022 (n=823)</p> <table border="1"> <tr> <td>White</td> <td>96.82%</td> </tr> <tr> <td>Irish Traveller</td> <td>0.12%</td> </tr> <tr> <td>Pakistani</td> <td>0.12%</td> </tr> <tr> <td>Black Caribbean</td> <td>0.00%</td> </tr> <tr> <td>Black Other</td> <td>0.00%</td> </tr> <tr> <td>Chinese</td> <td>1.29%</td> </tr> <tr> <td>Indian</td> <td>0.94%</td> </tr> <tr> <td>Bangladeshi</td> <td>0.00%</td> </tr> <tr> <td>Black African</td> <td>0.24%</td> </tr> <tr> <td>Other (please specify)</td> <td>0.47%</td> </tr> </table> <p>Northern Ireland Population Statistics</p> <table border="1"> <tr> <td>White</td> <td>98.21%</td> </tr> <tr> <td>Chinese</td> <td>0.35%</td> </tr> <tr> <td>Irish Traveller</td> <td>0.07%</td> </tr> <tr> <td>Indian</td> <td>0.34%</td> </tr> <tr> <td>Pakistani</td> <td>0.06%</td> </tr> <tr> <td>Bangladeshi</td> <td>0.03%</td> </tr> <tr> <td>Other Asian</td> <td>0.28%</td> </tr> <tr> <td>Black Caribbean</td> <td>0.02%</td> </tr> <tr> <td>Black Africa</td> <td>0.13%</td> </tr> <tr> <td>Black other</td> <td>0.05%</td> </tr> <tr> <td>Mixed</td> <td>0.33%</td> </tr> <tr> <td>Other</td> <td>0.13%</td> </tr> </table>	White	96.82%	Irish Traveller	0.12%	Pakistani	0.12%	Black Caribbean	0.00%	Black Other	0.00%	Chinese	1.29%	Indian	0.94%	Bangladeshi	0.00%	Black African	0.24%	Other (please specify)	0.47%	White	98.21%	Chinese	0.35%	Irish Traveller	0.07%	Indian	0.34%	Pakistani	0.06%	Bangladeshi	0.03%	Other Asian	0.28%	Black Caribbean	0.02%	Black Africa	0.13%	Black other	0.05%	Mixed	0.33%	Other	0.13%
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Source: Northern Ireland Census 2011. Census data from 2021 is not yet available.

Religious belief

During a pre-consultation engagement exercise with stakeholders, the potential effects on the proposed policy of the Section 75 equality categories were discussed. No matters were raised in respect of religious belief. Any potential equality impact will be explored again during the wider consultation.

Registrant’s Equality Survey 2021-2022 (n=848)

Christian Protestant	32.67%
Christian Roman Catholic	52.71%
Christian Other	2.59%
Buddhist	0.12%
Hindu	0.24%
Jewish	0.12%
Muslim	0.12%
Sikh	0.00%
No religion	10.61%
Other	0.83%

The Executive Office Labour Force Survey Religion Report shows that Roman Catholics make up 41% of NI working age population with Protestants making up 41%.

Northern Ireland Population Statistics

Roman Catholic	40.76%
Presbyterian	19.06%
C.o.I.	13.74%
Methodist	3.00%
Other Christian	.76%
Other religions	0.82%
No religion	10.11%

Sources: Executive Office 2007 Labour Force Survey Religion Report Labour Force Survey Religion Report 2017, NISRA, Northern Ireland Census 2011.

Sexual Orientation

During a pre-consultation engagement exercise with stakeholders, the potential effects on the proposed policy of

	<p>the Section 75 equality categories were discussed. No matters were raised in respect of sexual orientation. Any potential equality impact will be explored again during the wider consultation.</p> <p>The Registrant's Equality Survey 2021-2022 (n=846) found that 4.73% of respondents identified as identify as lesbian, gay or bisexual.</p> <p>1.3 % of the household population in Northern Ireland identify as lesbian, gay, or bisexual. Sources: Sexual Orientation, UK: 2019, ONS</p>
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Section C Assessment

Question: Will the proposed policy or decision impose inappropriate barriers or otherwise disadvantage people with protected characteristics?

Section 75 Category	Analysis	Level of impact: Yes -Minor/Yes -Major/No
Age	No needs, experiences and priorities have been identified.	No
Dependents	Flexibility in working arrangements may be required to facilitate commitments to dependents.	Yes Minor
Disability	<p>Patients with disabilities may require additional support and time to assist them to access Pharmacy Services.</p> <p>Pharmacists with disabilities may require reasonable adjustments which may impact on staffing levels or training.</p>	Yes Minor
Marital Status	No needs, experiences and priorities have been identified.	No
Men and Women generally	No needs, experiences and priorities have been identified.	No

Political Opinion	No needs, experiences and priorities have been identified.	No
Race	No needs, experiences and priorities have been identified.	No
Religious belief	No needs, experiences and priorities have been identified.	No
Sexual Orientation	No needs, experiences and priorities have been identified.	No

Section D Record of Screening Decision

Record of Screening Decision

Title of policy / decision to be screened

Complaints about the Pharmaceutical Society NI

On the basis of the answers to the screening question, I recommend that this policy / decision is –

<input type="checkbox"/>	<u>Screened In</u> – Necessary to conduct a full Equality Assessment
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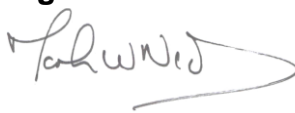
<input type="checkbox"/>	<u>Screened Out</u> – No Equality Assessment necessary (no impacts) N/A
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X	<p><u>Screened Out – Mitigating Actions (minor impacts)</u></p> <p>Policy objective is to increase the overall safety of the public by setting appropriate pharmacy staffing levels.</p> <p>Option, subject to consultation comments, to mitigate the identified factors, obligations to dependents/flexible working and reasonable adjustments (disability) to be considered in risk assessments to establish appropriate staffing levels.</p>
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Screening assessment completed by:

<p>Name: Simon McClenahan</p> <p>Job title: Policy, Standards and Engagement Officer</p> <p>Signature: <i>S McClenahan</i></p> <p>Date: 14/06/22</p>	<p>Policy Writer</p>
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Screening decision approved by:

<p>Name: Mark Neale</p> <p>Job title: Director of Public Affairs</p> <p>Signature:</p>  <p>Date: 17 June 22</p>	<p>Senior Manager</p>
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