

Appendix B

CHESHIRE EAST COUNCIL – EQUALITY IMPACT ASSESSMENT FORM

EQUALITY IMPACT ASSESSMENT

TITLE: Cheshire East Council Pharmaceutical Needs Assessment 2022

VERSION CONTROL

Date	Version	Author	Description of Changes
17/02/2022	0.1	Sarah Trelfa	1st draft
04/03/2022	0.2	Sarah Trelfa	2nd draft
16/03/2022	0.3	Sarah Trelfa	Final draft

CHESHIRE EAST COUNCIL –EQUALITY IMPACT ASSESSMENT

Stage 1 Description: Fact finding (about your policy / service /

Department	Public Health
Service	Public Health
Lead officer responsible for assessment	Sarah Trelfa
Other members of team undertaking assessment	Dr Susie Roberts, Healthwatch
Date	16/03/2022
Version	0.3
Type of document	Project
Is this a new/ existing/ revision of an existing document (please mark as appropriate)	New
Title and subject of the impact assessment (include a brief description of the aims, outcomes, operational issues as appropriate and how it fits in with the wider aims of the organisation)	<p>Every Health and Wellbeing Board (HWB) in England has a statutory responsibility to publish and keep an up to date statement of the needs for pharmaceutical services of the population in its area, referred to as a Pharmaceutical Needs Assessment (PNA). The PNA is not a new policy, service or function but will be used in the decision-making process when identifying a need for new, or changes to, pharmaceutical services. It will be used by the local NHS England Area Team to assess applications for new, additional or relocated premises. It will also be used by NHS England to make decisions in the commissioning of NHS funded services that can be provided by local community pharmacies. Additionally, Local Authorities and Clinical Commissioning Groups may use the PNA when commissioning services to meet local health needs and priorities. This assessment therefore considers an assessment of the engagement of residents in Cheshire East who may influence the PNA, to ensure it meets the local health needs and priorities.</p>

Please attach a copy of the strategy/ plan/ function/ policy/ procedure/ service

This is the fourth PNA for Cheshire East (previously published in 2011, 2015 and 2018) and this draft PNA is required to be approved by the Cheshire East Health and Wellbeing Board (HWB) by October 2022. According to section 128A of the 2006 Act, the PNA must relate to all the pharmaceutical services provided under arrangements made by the NHS Commissioning Board and should make an assessment of the following:

- the demography of its area
- whether there is sufficient choice to obtaining pharmaceutical services within its area
- the different needs of different localities within the area
- whether pharmaceutical services provided in the area of any neighbouring HWB would secure improvements, or better access to pharmaceutical services within its area
- whether any other NHS services provided in or outside its area affect the need for pharmaceutical services in its area and would secure improvements or better access to pharmaceutical services within its area
- Future needs relating to the number of people in its area who require pharmaceutical services, the demography of its area and the risks to the health or wellbeing of people in its area.

Each HWB must also consult (for a minimum period of 60 days) with a number of professional bodies about the provision of pharmaceutical services within its area.

Based on the action taken so far to complete the PNA, currently pharmaceutical provision in the towns and villages of Cheshire East borough is assessed as adequate in terms of location, opening hours and pharmaceutical services offered to the population. Through examination of the available information (as stated above and using data from NHS Business Services Authority, NHS England and CCG), the PNA has not identified current or anticipated future need for new NHS pharmaceutical service providers in Cheshire East. This brief impact assessment aims to consider the equality issues that may be present, and address them where possible, however it should be noted that the PNA is a high level document with multiple agencies involved in the provision of pharmaceutical services. As such, further work will need to be done, by all partners involved, to identify any equalities impacts as work progresses; for example as services are commissioned, procured, in the contract management of services and as operational decisions about service provision are made.

Who are the main stakeholders and have they been engaged with? (e.g. general public, employees,

- Our main stakeholders are:
- All Cheshire East residents
 - NHS England
 - Cheshire CCG
 - Local Pharmaceutical Committee (LPC)
 - Local Medical Committee (LMC)

**Councillors, partners,
specific audiences,
residents)**

- Any Local Healthwatch organisation, any other patient, consumer or community group with an interest in provision of pharmaceutical services in the area
- Any persons in the pharmaceutical lists and any dispensing doctors
- NHS trust or NHS foundation trust
- NHS Commissioning Board
- Any neighbouring Health and Wellbeing Boards

As a part of the development of the PNA, to date, we have undertaken engagement with:

- Regular consultation with members of the Cheshire East Pharmaceutical Needs Assessment Steering Group, which brings together representatives from the Cheshire Clinical Commissioning Group, NHS England, the Local Pharmaceutical Committee, the Local Medical Committee, and Healthwatch.
- Community Pharmacies based in Cheshire East via a pharmacy contractors survey. This survey captured the advanced and essential services provided by pharmacies, accessibility, opening hours, public health services currently providing and willing or unable to provide, prescription collection and delivery offered. All 78 pharmacies within Cheshire East engaged with and responded to this survey.
- Dispensing doctors in Cheshire East were consulted with via a dispensing doctors survey. This survey captured the advanced and essential services provided by dispensing doctors, accessibility, opening hours, public health services currently providing and willing or unable to provide, prescription collection and delivery. All 6 dispensing doctors submitted a response.
- A public survey for all Cheshire East residents. This was conducted during November 2021-December 2022 to capture public views on pharmacy provision. The survey ran for a period of 30 days and was available both online on the Cheshire East Council website and in paper forms to complete in Cheshire East libraries. A total of 514 responses were received. In addition, a contact centre number was set up for respondents to participate in the survey, should they be unable to access the survey online. The public survey was widely promoted online via the internal staff newsletter, the council's social media platforms, through our steering group partners. The public survey was also promoted via a one-slide presentation on TV screens in the libraries and in leisure centres across Cheshire East.

- Analysis of the public survey showed that fewer responses were received from younger age bands, 16-24, 25-34 and 35-44 and as such, are underrepresented within the survey. For the age band 45-54 the proportion is representative. The 55-64 and 65-75 age bands are over representative, whereas the oldest age band (75 and over) is representative.
- The responses to sexuality show a majority of responses selected heterosexual (78%). 1% of respondents selected 'Gay or Lesbian'. There is no data available on sexuality at a Local Authority level, so it is unknown if this is representative of demography in Cheshire East.
- There was also a skew in terms of gender, with more females (58%) providing a response to the survey than males (33%).
- With regards to ethnicity, the majority of respondents identified as 'White – British' (52%) or 'White – English' (33%) (85% in total). This is representative of the ethnicity demography in Cheshire East.
- Only a small number of respondents selected that they had a disability (71/466). Of those, 8% stated their disability was related to physical, long-term illness (6%), deaf or hard of hearing (3%), mental health (2%).
- This PNA has used ONS population counts to provide population numbers by geographical areas within Cheshire East. This has been used to estimate the number of pharmacies available to residents within their local area and highlight potential differences in provision. Population characteristics of Cheshire East residents have been taken into account through use of Census 2011 data, looking at a number of socio-economic variables. This has allowed consideration of different services that may be required in different local areas of Cheshire East.
- It is important to note that there was a small number of respondents to the Public Survey (514) and so we cannot be certain that this is representative of the Cheshire East population.
- Analysis of the public survey showed no evidence to suggest an impact on the following protected characteristics: marriage & civil partnership, religion, gender reassignment, pregnancy and maternity.
- However, analysis of both the public survey and the pharmacy contractors survey identified issues related to pharmacy accessibility and opening times. Therefore, in the consultation, we will seek to engage with groups with mobility

	<p>issues/older age/disability via our network with Healthwatch. We will also seek to ask about opening hours in the consultation and raise this in the PNA as a recommendation for NHS England to consider when commissioning pharmacies.</p> <ul style="list-style-type: none"> • There will also be the opportunity to feedback any other impacts relating to the PNA during the consultation process. We will do this by making the draft PNA available for consultation for a minimum of 60 days via the Cheshire East Council website. We will also engage with stakeholders and key contacts to further promote the formal consultation and improve engagement on the draft PNA (please see sections below for further detail). We will do this by compiling a list of key contacts (as identified by this EIA and by our steering group) and sending around an email with the link to the consultation on the Cheshire East Council website. We will publish the draft PNA in full. As well as this, we will provide a one page plain English summary, and a longer 3 page executive summary, which signposts to the relevant sections of the full draft PNA document. Hard copies of the draft PNA and the questionnaire will be made available to those who request it, as well as easyread copies. We will also set up a customer contact telephone line for residents and stakeholders to participate, should they be unable to access the paper copies and the online version. The customer services centre can also support with language interpretation.
<p>Consultation/ involvement carried out.</p>	<p>YES</p>
<p>What consultation method(s) did you use?</p>	<ul style="list-style-type: none"> • Public survey - available both online on the Cheshire East Council Website and in paper forms to complete in Cheshire East libraries. A total of 514 responses were received. In addition, a contact centre number was set up for respondents to participate in the survey, should they be unable to access the survey online. The public survey was widely promoted online via the internal staff newsletter, the council's social media platforms, through our steering group partners. The public survey was also promoted via a one-slide presentation on TV screens in the libraries and in leisure centres across Cheshire East. • Dispensing doctors in Cheshire East were consulted with via a dispensing doctors survey via email. • Community Pharmacies based in Cheshire East via a pharmacy contractors survey.

- Regular consultation with members of the Cheshire East Pharmaceutical Needs Assessment Steering Group. Representatives from Healthwatch, NHS England, GPs and the Local Medical Committee, Local Pharmaceutical Committee and Cheshire Clinical Commissioning Group.

Stage 2 Initial Screening

<p>Who is affected and what evidence have you considered to arrive at this analysis? (This may or may not include the stakeholders listed above)</p>	<p>The groups of people affected are all residents of Cheshire East.</p>
<p>Who is intended to benefit and how?</p>	<p>It is the intention that as many residents as possible will benefit from the review of pharmaceutical services. It will enable all stakeholders to shape the production of the PNA and comment on areas that have not been considered.</p>
<p>Could there be a different impact or outcome for some groups?</p>	<p>Yes - we are aware from the public survey that there is some variation in pharmaceutical provision, in particular access to some public health commissioned services, private consultation space, pharmacy accessibility, and language barriers.</p> <p>We want understand impact of this on the residents in Cheshire East in relation to pharmacy provision. Specifically, we will engage with the University of the 3rd Age, people with learning disabilities and autism, people with sensory disabilities, people with mental health conditions, gypsy & traveller community, people living in the 20% most deprived neighbourhoods in Cheshire East, asylum seekers, all care coordinators, faith groups, neighbouring health and wellbeing boards, and Cheshire & Warring Carers Trust to promote the consultation and seek feedback on their views regarding access to some public health commissioned services, private consultation space, pharmacy accessibility, and language barriers.</p>

	<p>Areas with higher levels of deprivation, such as Crewe and Macclesfield, are likely to be disproportionately affected by pharmaceutical changes and we want to understand the potential impact of this in the consultation. We will engage with Connected Community Development Officers and Local Area Coordinators to promote the consultation and seek feedback on their views to further inform the PNA.</p> <p>Rural communities are also likely to be impacted by changes in pharmaceutical provision and so we want to understand the potential impact of this in the consultation.</p> <p>Feedback will be used to further inform the PNA. We will make recommendations in the PNA to NHS England.</p>
<p>Does it include making decisions based on individual characteristics, needs or circumstances?</p>	<p>No</p>
<p>Are relations between different groups or communities likely to be affected? (eg will it favour one particular group or deny opportunities for others?)</p>	<p>The PNA finds that overall provision of pharmaceutical services in Cheshire East is adequate for the population. Future housing developments are included to highlight any potential gaps in pharmacy provision.</p>
<p>Is there any specific targeted action to promote equality? Is there a history of unequal outcomes (do you have enough evidence to prove otherwise)?</p>	<p>Protected characteristics such as age, gender and ethnicity are collected in relation to pharmaceutical services including sexual health (emergency hormonal contraception, chlamydia screening), substance misuse and stop smoking services. This data is used by commissioning leads to assess any gaps in access/uptake of services. (Data is not routinely collected for all services).</p> <p>Residents may also use customer feedback or complaints processes to inform pharmacies of specific barriers they experience.</p>

	The PNA includes a recommendation for NHS England (and Cheshire East Council / Cheshire Clinical Commissioning Group) to review service quality and uptake, including consideration of cultural and equalities needs.
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Is there an actual or potential negative impact on these specific characteristics?

Age	Y
Disability	Y
Gender reassignment	N
Marriage & civil partnership	N
Pregnancy & maternity	N
Race	Y
Religion & belief	N
Sex	Y
Sexual orientation	N

Stage 3 Evidence

	What evidence do you have to support your findings? (quantitative and qualitative) Please provide additional information that you wish to include as appendices to this document, i.e., graphs, tables, charts	Level of Risk (High, Medium or Low)
Age	<p>There are a number of commissioned services that are targeted for specific age groups i.e. Chlamydia screening/emergency contraception services for under 25s and NHS Health Checks for 40-74 year olds which are both nationally mandated programmes. The public survey did not identify any negative impacts of the PNA on access or other service provision on the basis of age.</p> <p>In the pharmacy contractors survey, it was identified that not all sites are accessible to wheelchairs or have enough floor space to enable people in wheelchairs into the pharmacy. This may have a negative impact on those who are of an ageing population whose mobility needs change over time. This is also a concern with a growing ageing population in Cheshire East. However, no comments regarding this were identified in the public survey. We will seek to gain feedback from older adults, such as the University of the 3rd Age (U3A), and people with mobility issues through our contacts at Healthwatch. We will use this feedback to adapt the recommendations in the PNA and recommendations to NHS England.</p>	Low
Marriage and Civil Partnership	There is no evidence to suggest an impact on this protected characteristic. There will be the opportunity to feedback any impacts relating to this during the consultation process.	N/A
Religion	There is no evidence to suggest an impact on this protected characteristic. There will be the opportunity to feedback any impacts relating to this during the consultation process.	N/A
Disability	In the pharmacy contractors survey, it was identified that not all sites are accessible to wheelchairs or have enough floor space to enable people in wheelchairs into the pharmacy. This may have a negative impact on those with a disability. However, no comments regarding this were identified in the public survey. We will seek to engage with Cheshire Advocacy, Pure Insight, Richmond Fellowship, and Disability Information Services, during the consultation to gather feedback on the PNA.	Low
Pregnancy and Maternity	There is no evidence to suggest an impact on this protected characteristic. There will be the opportunity to feedback any impacts relating to this during the consultation process.	N/A

Sex	Within the public survey responses, there was a skew towards number of females responding to the survey (58%). Therefore, we will seek to promote the PNA within male support groups, such as Mentell, to gather feedback on the PNA.	N/A
Gender Reassignment	There is no evidence to suggest an impact on this protected characteristic. There will be the opportunity to feedback any impacts relating to this during the consultation process.	N/A
Race	Questions were asked about languages spoken by pharmacy staff, which has been summarised in the PNA. There may be an impact on individuals accessing pharmaceutical services who speak their language. We will seek to engage with people whose first language is not English to ascertain their views on the PNA. We will also share the PNA consultation with Cheshire East Council Community Connector team to ask for their feedback regarding accessing pharmacy provision due to language barriers.	N/A
Sexual Orientation	In the public survey, the responses to sexuality show a majority of responses selected heterosexual (78%). 1% of respondents selected 'Gay or Lesbian'. There is no data available on sexuality at a Local Authority level, so it is unknown if this is representative of demography in Cheshire East. There is no evidence to suggest an impact on this protected characteristic. There will be the opportunity to feedback any impacts relating to this during the consultation process.	N/A

Stage 4 Mitigation

Protected characteristics	Mitigating action	How will this be monitored?	Officer responsible	Target date
	<i>Once you have assessed the impact of a policy/service, it is important to identify options and alternatives to reduce or eliminate any negative impact. Options considered could be adapting the policy or service, changing the way in which it is implemented or introducing balancing measures to reduce any negative impact. When considering each option you should think about how it will reduce any negative impact, how it might impact on other groups and how it might impact on relationships between groups and overall issues around community cohesion. You should clearly demonstrate how you have considered various options and the impact of these. You must have a detailed rationale behind decisions and a justification for those alternatives that have not been accepted.</i>			

Age	The PNA includes a recommendation for NHS England (and Cheshire East Council and NHS Cheshire Clinical Commissioning Group) to review accessibility of pharmacy sites, service quality and uptake, including consideration of cultural and equalities needs.	<p>An approach to monitoring will be further developed according to addressing relevant feedback as part of the consultation.</p> <p>Additionally, the Cheshire East PNA steering group will continue to meet annually and will review any changes to Pharmacy provision to determine if there is a requirement to reassess needs. Supplementary statements will be issued to reflect changes to the current PNA.</p>	NHS England, Cheshire East Council and Cheshire CCG	Review by September 2025
Marriage and Civil Partnership	N/A			

Religion	N/A			
Disability	The PNA includes a recommendation for NHS England (and Cheshire East Council and NHS Cheshire Clinical Commissioning Group) to review accessibility of pharmacy sites, service quality and uptake, including consideration of cultural and equalities needs.	<p>An approach to monitoring will be further developed according to addressing relevant feedback as part of the consultation.</p> <p>The Cheshire East PNA steering group will continue to meet annually and will review any changes to Pharmacy provision to determine if there is a requirement to reassess needs. Supplementary statements will be issued to reflect changes to the current PNA.</p>	NHS England, Cheshire East Council and Cheshire CCG	Review by September 2025
Pregnancy and Maternity	N/A			

Sex	Pharmacies should ensure appropriate male/female staff are available to assist with gender specific services eg sexual health related services.	Pharmacies will be made aware of this EIA and encouraged to engage with this action.	Community pharmacies in Cheshire East	September 2025
Gender Reassignment	N/A			
Race	Pharmacies could review their service user feedback and complaints to see whether there are any reported access issues in this area to consider. Eg recruiting staff who speak a second language, use of interpretation services.	Pharmacies will be made aware of this EIA and encouraged to engage with this action.	Community pharmacies in Cheshire East	September 2025
Sexual Orientation	Pharmacies could review their policies and practises using evidence such as service user feedback and complaints to see whether there are any reported access issues in this area to consider. eg. relating to sexual health service	Pharmacies will be made aware of this EIA and encouraged to engage with this action.	Community pharmacies in Cheshire East	September 2025

5. Review and Conclusion

Specific actions to be taken to reduce, justify or remove any adverse impacts	How will this be monitored?	Officer responsible	Target date
Equality of access to pharmaceutical services for all Cheshire East residents.	The potential accessibility barriers and inequalities in access of pharmaceutical services in Cheshire East have been identified in the PNA through consideration of the demographics. The consultation will provide further opportunity to feedback concerns. Recommendations to improve equality of access are included in the PNA.	NHS England and Improvement	September 2022
Equality of access to pharmaceutical services for all Cheshire East residents.	Equality Impact Assessment to be reviewed before the next PNA in 2025 to assess whether additional survey work relating to facilities available at pharmacies for patients with protected characteristics is required.	Cheshire East Council – Public Health Team	September 2025

Please provide details and link to full action plan for actions	N/A
When will this assessment be reviewed?	September 2025
Are there any additional assessments that need to be undertaken in relation to this assessment?	No
Lead officer sign off	Sarah Trelfa
Date	16/03/2022

Head of service sign off	Dr Susie Roberts
Date	16/03/2022

Please publish this completed EIA form on the relevant section of the Cheshire East website