

# Equality Impact and Needs Analysis Guidance and Template : 2021

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## Guidance notes

### Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality

analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present with divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme. All Cabinet reports will also publish related

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and [www.southwarkadvice.org.uk](http://www.southwarkadvice.org.uk)).

Whilst the equality analysis is being considered, Southwark Council recommends considering implications arising from socio-economic disadvantage, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a policy commitment to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering impacts/needs arising from socio-economic disadvantage in all equality analyses, not forgetting to include identified potential mitigating actions. **The Council has adopted the Socio-Economic Duty as part of its overall equality, diversity and inclusion policy commitments in the Southwark Equality Framework.** This requires us to ensure we do not make any conditions worse for those experiencing socio-economic disadvantage through our policies and practices.

**Section 1: Equality impact and needs analysis details**

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<b>Proposed policy/decision/business plan to which this equality analysis relates</b>	Budget challenge – 114: Efficiencies in provision of Sexual Health services
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<b>Department</b>	Children and Adults	<b>Division</b>	Public Health		
<b>Period analysis undertaken</b>	December 2023				
<b>Date of review (if applicable)</b>					
<b>Sign-off</b>		<b>Position</b>		<b>Date</b>	

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## Section 2: Brief description of policy/decision/business plan

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### 1.1 Brief description of policy/decision/business plan

114: Efficiencies in delivery of sexual health service provision

The current community contraceptive offer is being reviewed with a view to optimise the offer across the borough to better serve the contraceptive needs of Southwark's population. This includes:

- reviewing and updating the specification as part of the re-commissioning of pharmacy contraceptive services
- reviewing and updating GP LARC (Long-acting reversible contraception) service arrangements to optimise and increase service provision.

Good sexual and reproductive health is unequally distributed across the population. From 2020-22, over half of the individuals who accessed Emergency Hormonal Contraception (EHC) in Southwark had used EHC on a previous occasion within the last year<sup>1</sup>, which is an indicator of unmet reproductive health need.

SRH (Sexual and reproductive health) pharmacy services can offer a comprehensive service, utilising EHC appointments as an opportunity to engage residents with the wider reproductive healthcare available to them. The re-commissioning of contraceptive services aims to strengthen our contraceptive offer in Southwark and increase the accessibility of the services.

This proposal therefore is not expected to have a negative impact and is expected to have a positive impact on our communities to support them to have better access to contraception locally.

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<sup>1</sup> Southwark Community Pharmacy Sexual and Reproductive Health Services. Southwark Council: London. 2023.

### Section 3: Overview of service users and key stakeholders consulted

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2. Service users and stakeholders	
<b>Key users of the department or service</b>	Residents of London Borough of Southwark with reproductive health needs relating to contraception (including EHC)
<b>Key stakeholders were/are involved in this policy/decision/business plan</b>	Southwark Council Public Health team; Public Health commissioners across LSL; Southeast London ICB; the Primary Care Network (PCN); pharmacies in Southwark (including the Local Pharmaceutical Committee (LPC); GP Federations (IHL and QHS); GP Practice leads and LARC fitters / providers .

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## Section 4: Pre-implementation equality impact and needs analysis

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This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

### Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

**The public sector equality duty ( PSED )** requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under-represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

**Age** - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

**Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.**

**Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**

<p>This is likely to have an overall positive impact on those of reproductive age. Increasing the number of pharmacies and GPs offering provision will expand access to a larger number of residents, meeting unmet need.</p>	<p>In particular, those in the most deprived areas of the borough are likely to be positively impacted. Priority will be given in the commissioning process to pharmacies located in areas of higher deprivation, thus increasing accessibility and availability.</p> <p>Improving accessibility for LARC via GPs is expected to have a positive impact through increasing accessibility to contraceptive services locally.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-Economic data on which above analysis is based</b></p>
<p>Data from the existing pharmacy service<sup>2</sup> indicates that the 20-24 age group constitutes the highest number of service users accessing EHC.</p>	<p>High-level postcode data from the pharmacy SRH service indicates that 75% of all appointments delivered were to those living in SE5, SE15, SE16 and SE17 postcodes<sup>3</sup>. These postcodes map onto the areas of highest deprivation in Southwark, as per the 2019 indices of deprivation data<sup>4</sup>.</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>No actions identified which relate to this protected characteristic.</p>	

<p><b>Disability</b> - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.</p> <p>Please note that under the PSED due regard includes:</p> <p>Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities." This also includes the need to understand and focus on different needs/impacts arising from different disabilities.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p>There is no data to suggest that this protected group will be negatively impacted by this decision. Increasing</p>	<p>Increased availability and accessibility of the service will increase opportunities to access the SRH service free of</p>

<sup>2</sup> Southwark Community Pharmacy Sexual and Reproductive Health Services. Southwark Council: London. 2023.

<sup>3</sup> Southwark Community Pharmacy Sexual and Reproductive Health Services. Southwark Council: London. 2023.

<sup>4</sup> Indices of Deprivation 2019 JSNA Factsheet. Southwark Council: London. 2019.



the availability and accessibility of the service across Southwark is likely to have a positive impact on disabled residents, reducing travel distance.	charge to residents. This may have a positive socioeconomic impact on disabled residents.
<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above analysis is based</b>
While disability should not be treated as a homogenous category, national-level data suggest that people with disabilities travel less frequently and shorter distances than able-bodied people <sup>5</sup> . London-level data also demonstrate an inverse relationship between travel distance and sexual health service use <sup>6</sup> .	The 2021 Census <sup>7</sup> found that 3.9% of Southwark residents are economically inactive due to long-term sickness or disability. Increasing the availability of these services is likely to have a positive impact on disabled residents, particularly those who are economically inactive.
<b>Mitigating and/or improvement actions to be taken</b>	
<b>Mitigating and/or improvement actions to be taken</b>	
It will be a requirement of any provider that physical consultation spaces are accessible, with requirements laid out in the service specification. For example, pharmacies must be wheelchair accessible, and pharmacies must follow the Accessible Information Standard <sup>8</sup> (as defined by the General Pharmaceutical Council).  As a healthcare provider, GPs must make reasonable adjustments for people with disabilities, with guidance on this provided by the Care Quality Commission (CQC) and Healthwatch England.	

<p><b>Gender reassignment:</b></p> <ul style="list-style-type: none"> <li>- The process of transitioning from one gender to another.</li> </ul> <p><b>Gender Identity:</b> Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.</p>	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b>
There is no data to suggest that this protected group is will be negatively impacted by this proposal.	

<sup>5</sup> Disabled people's travel behaviour and attitudes to travel. Department for Transport: London. 2017.

<sup>6</sup> City and Hackney Sexual Health Needs Assessment 2023. City of London and Hackney Councils: London. 2023.

<sup>7</sup> Census of England and Wales 2021. The Office for National Statistics: London. 2022.

<sup>8</sup> Standards for Registered Pharmacies. General Pharmaceutical Council: London. 2018.

<b>Equality information on which above analysis is based.</b>	<b>Socio-economic data on which above analysis is based</b>
N/A	
<b>Mitigating and/or improvement actions to be taken</b>	
Training delivered to pharmacists will include guidance on gender-inclusive service provision, as per national recommendations <sup>9</sup> endorsed by the Faculty of Sexual and Reproductive Health.	

<b>Marriage and civil partnership –</b> In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. <b>(Only to be considered in respect to the need to eliminate discrimination.)</b>	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b>
There is no data to suggest that this protected group will be negatively impacted by this proposal.	
<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above analysis is based</b>
N/A	
<b>Mitigating or improvement actions to be taken</b>	
No actions identified which relate to this protected characteristic.	

<sup>9</sup> Women's Lives, Women's Rights: Strengthening Access to Contraception Beyond the Pandemic. All Party Parliamentary Group on Sexual and Reproductive Health in the UK: London. 2020.

<p><b>Pregnancy and maternity</b> - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p>This proposal may have a positive impact on those in the postpartum stage.</p>	<p>There is no data to suggest any socioeconomic impacts in relation to this protected group.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p>Shorter intervals between pregnancies increase the risk of low birth weight and preterm birth<sup>10</sup>, meaning increasing the availability of contraceptive services postpartum may lead to fewer short inter-pregnancy intervals thus reducing negative maternal health impacts.</p>	<p>N/A</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>No actions identified which relate to this protected characteristic.</p>	

<p><b>Race</b> - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p>This decision may have a positive impact upon service users of Black ethnic backgrounds in particular.</p>	<p>Increased availability and accessibility of the service will increase opportunities to access contraceptive services free of charge to residents. This may have a positive socioeconomic impact on residents of Black ethnic backgrounds in particular.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>

<sup>10</sup> Health matters: reproductive health and pregnancy planning. Public Health England: London. 2018.

<p>Black women in Southwark experience some of the poorest sexual and reproductive health outcomes in the borough, including higher rates of abortion and overrepresentation among EHC service users<sup>11</sup>, indicating unmet contraceptive need. The new service will increase the accessibility and availability of SRH pharmacy services within the borough, which will likely particularly positively impact on Black residents by responding to this need.</p>	<p>The Southwark 2019 Health Inequalities<sup>12</sup> report identified that the most deprived areas have the highest populations of residents from Black ethnic backgrounds.</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>Training delivered to pharmacists will include guidance on anti-racist practices within service provision, as per national recommendations supported by the NHS and the Royal Pharmaceutical Society<sup>13</sup>. Southwark anti-racist practices will also be shared with GP federations and practices as part of the wider work with SEL ICB partners. Annual audits of the service will monitor levels of service use according to ethnicity; actions to increase uptake of long-term contraception will be developed across the wider sexual health portfolio based on findings.</p>	<p>Priority will be given in the commissioning process to pharmacies located in areas of highest deprivation, which corresponds to higher populations of residents from Black ethnic backgrounds.</p>

<p><b>Religion and belief</b> - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p>There is no data known to suggest that this protected group will be negatively impacted by this proposal.</p>	
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p>N/A</p>	
<p><b>Mitigating and/or improvement actions to be taken</b></p>	

<sup>11</sup> Lambeth, Southwark and Lewisham Sexual and Reproductive Health Strategy 2019-24. Lambeth, Southwark and Lewisham Public Health Departments: London. 2018.

<sup>12</sup> Health Inequalities in Southwark. Southwark Council: London. 2019.

<sup>13</sup> Joint National Plan for Inclusive Pharmacy Practice in England. NHS England, the Royal Pharmaceutical Society and the Association of Pharmacy Technicians UK: London. 2021.

N/A	
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<b>Sex</b> - A man or a woman.	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
This decision will likely have a positive impact on service users whose biological sex is female.	Reducing unwanted pregnancies will result in positive impacts through cost savings to people whose biological sex is female.
<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above analysis is based</b>
Good reproductive health is an essential part of good health across the life course. Consequences of poor reproductive health exacerbate inequalities in health, education, and socio-economic status (and conversely, these factors impact on reproductive health) <sup>14</sup> .	The average cost of an unintended pregnancy in England is £1,663 in direct healthcare costs, rising to £2,922 with the inclusion of social costs (including loss of earnings) <sup>15</sup> .
<b>Mitigating and/or improvement actions to be taken</b>	
The service will be available to all Southwark residents with reproductive health needs. No action identified related to this protected characteristic.	

<b>Sexual orientation</b> - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
There are no data to suggest that this protected group will be negatively impacted by this proposal.	
<b>Equality information on which above analysis is based</b>	<b>Socio-economic data on which above analysis is based</b>

<sup>14</sup> Lambeth, Southwark and Lewisham Sexual and Reproductive Health Strategy 2019-24. Lambeth, Southwark and Lewisham Public Health Departments: London. 2018.

<sup>15</sup> Can we reduce costs and prevent more unintended pregnancies? A cost of illness and cost-effectiveness study comparing two methods of EHC. Thomas, C. and Cameron, S. BMJ Open. 2013.

N/A	
<b>Mitigating and/or improvement actions to be taken</b>	
No action identified related to this protected characteristic.	

<b>Human Rights</b> There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour , Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	
There are no identified impacts of the proposed decision on the Human Rights articles.	
<b>Information on which above analysis is based</b>	
N/A	
<b>Mitigating and/or improvement actions to be taken</b>	
No action identified related to this protected characteristic.	

## **Conclusions**

### **Summarise main findings and conclusions of the overall equality impact and needs analysis for this area:**

This proposal is expected to have a positive impact on the community through increasing local accessibility to contraceptive services in Southwark.

## Section 5: Further equality actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	Ensuring equitable access to services	Ensuring regular monitoring of equalities data relevant to services	Annual monitoring

5. Equality and socio-economic objectives (for business plans)				
Based on the initial analysis above, please detail any of the equality objectives outlined above that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.				
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
No further actions beyond that identified above				

6. Review of implementation of the equality objectives and actions			

## Implementation Equality Impact and Needs Analysis

