

Equality Analysis Form

The following questions will document the effect of your activity on equality, and demonstrate that you have paid due regard to the Public Sector Equality Duty. The Equality Analysis (EA) guidance should be used read before completing this form.

To be completed at the earliest stages of the activity and before any decision making and returned via email to GMSS Equality Diversity Human Rights Business Partner for Quality Assurance:

Rosie Kingham: rosie.kingham@nhs.net

Section 1: Responsibility

1	Name & role of person completing the EA:	Aleksandra Houghton, Advanced Medicines Optimisation Pharmacist, NHS Greater Manchester Shared Services (hosted by NHS Oldham CCG)
2	Service/ Corporate Area	Medicine Optimisation
3	Head of Service or Director (as appropriate):	Nigel Dunkerley
4	Who is the EA for? (Name of other organisation)	Oldham CCG

Section 2: Aims & Outcomes

5	What is being proposed? Please give a brief description of the activity.	On 29th March 2018, NHS England issued guidance to CCGs titled: Conditions for which over the counter items should not routinely be prescribed in primary care: Guidance for CCGs. This guidance proposes that certain medications will not be routinely commission at NHS expense. These medicines are for conditions that: <ul style="list-style-type: none"> •may be considered to be self-limiting, so they do not need treatment as they will get better of their own accord, or •are suitable for self-care, so that the person suffering does not normally need to seek medical advice and can manage the condition by purchasing Over The Counter (OTC) items unless there are clinically exceptional circumstances.
6	Why is it needed? Please give a brief description of the activity.	This guidance was considered and approved for adoption as CCG policy at GMMMG Clinical Standards Board on 9th August. GM Medicines Optimisation CCG leads decided to take a GM approach on delivery and implementation of the NHS England policy. It was decided that, as per NHS England recommendation, CCGs will have to carry out local E&D assessments before implementation and mitigate any issues identified.
7	What are the intended outcomes of the activity?	Potential to save approximately £4.5M per annum across GM, approximately 500K across Oldham (saving if prescribing at level of Bury CCG per population).
8	Expected Implementation Date	June 2019
9	Who does it affect?	Population of Oldham

Section 3: Establishing Relevance to Equality & Human Rights

10	What is the relevance of the activity to the Public Sector Equality Duty? Select from the drop down box and provide a reason.		
	General Public Sector Equality Duties	Relevance (Yes/No)	Reason for Relevance
	To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by Equality Act 2010	No	

	To advance equality of opportunity between people who share a protected characteristic and those who do not.	No	
	To foster good relations between people who share a protected characteristic and those who do not	No	
10.1	Use the drop down box and advise whether the activity has a positive or negative effect on any of the groups of people with protected equality characteristics and on Human Right		

Protected Equality Characteristic	Positive (Yes/No)	Negative (Yes/No)	Explanation
Age		Yes	Age restrictions on the license to sell certain medications could impact but this has been mitigated by excluding these groups under the policy.
Disability		Yes	Potential negative impacts are mitigated by policy exclusions and GP clinical judgment.
Gender	No		No anticipated impact
Pregnancy or maternity	No		No anticipated impact
Race	No		No anticipated impact
Religion and belief	No		No anticipated impact
Sexual Orientation	No		No anticipated impact
Other vulnerable group		Yes	Potential negative impacts on people living in poverty or asylum seekers are mitigated by policy exclusions and GP clinical judgment.
Human Rights	No		No anticipated impact
If you have answered No to all the questions above and in question 10, explain below why you feel your activity has no relevance to Equality and Human Rights.			

Mitigation is managed by excluding groups that will be negatively impacted and by the discretion of GPs to prescribe where they feel a patient would be put at risk if they do not issue medication by NHS prescription.

Section 4: Equality Information and Engagement

11	What equality information or engagement with protected groups has been used or undertaken to inform the activity. Please provide details.	
	Details of Equality Information or Engagement with protected groups	Internet link if published & date last published http://www.oldhamccg.nhs.uk/Publications/Equality-and-Diversity https://www.gov.uk/guidance/equality-act-2010-guidance
11.1	Are there any information gaps, and if so how do you plan to address them	A Guide and implementation toolkit are in the development process. A GM wide finish and task group has been set up to develop the toolkit for community pharmacists and GPs. This group and Communication and Engagement Leads are also working on the engagement with the local populations.

Section 5: Outcomes of Equality Analysis

12	Complete the table to conclude the EA.	
	What will the likely overall effect of your activity be on equality?	Implementation of this advice will help reduce unwarranted variation in prescribing rates of medicines that may be used to

		treat self-limiting illnesses.
	What recommendations are in place to mitigate any negative effects identified in 10.1?	The GMMMG Proposed Commissioning Statement includes a list of exemptions when OTC treatment can be prescribed at NHS expense. The BMA also provide advice to GPs to use their clinical judgment when deciding on the availability of the treatment.
	What opportunities have been identified for the activity to add value by advancing equality and/or foster good relations?	Implementation will support CCGs to use their prescribing resources effectively and deliver best patient outcomes from the medicines that their local population uses. It will support the NHS to achieve the greatest value from the money that it spends.
	What steps are to be taken now in relation to the implementation of the activity?	The next step of the project will be to engage with the population of Oldham.
Section 6: Monitoring and Review		
13		