

Equality Impact Assessment

Section One: General Information:

1.1 Name of person completing this assessment:

**McKenzie HR Consultants in Consultation with the General
Pharmaceutical Council**

Function: Diversity and Equality

**Contact Tel No: Christine Gray, Head of Corporate Governance, General
Pharmaceutical Council 020 3365 3503**

1.2 Title of Policy/Service/Function/Project being assessed:

Copy of policy attached to this assessment please tick ✓



The General Pharmaceutical Council (Fitness to Practise and Disqualification
etc Rules) Order of Council 2010

1.3 Is this policy, service, function or project: ✓



New



Existing



Proposed



Changing

When was it issued ?
(DD/MM/YY)

Not Stated

**Please list below, any other policies or documents that are
either related to the policy, service, function or project being
assessed or are referred to within this assessment:**

***The Pharmacy Order 2010: Articles 48(1)(b), 51(5), 52(1) and (2),
57(3) 61(1)-(3) and (6), 63(4), 64(8), 66(1) and paragraph 5 of
Schedule One.***

Equality Impact Assessment

Section One: General Information (continued):

1.4 What are the principal aims of the policy, service, function or project being assessed ? For example, why does this exist within the GPhC and what is it designed to achieve ?

This policy details the procedures that must be followed within *The General Pharmaceutical Council* ('the Council') when considering three different types of allegations made against its registrants. The three types of allegations dealt with under the *Fitness to Practise* rules are:

- Allegations that the fitness to practise of a registrant is impaired.
- Allegations that an individual or a body corporate should be disqualified from inclusion within the Council's register of pharmacy retail premises.
- Allegations of criminal conduct that the Council is under a duty to investigate.
- Application for restoration of information on the Council's register. Commonly, this would be where registration was previously removed as a sanction imposed as a result of a '*Fitness to Practise*' hearing.

In summary, the process for dealing with such allegations is as follows:

All allegations are initially 'screened' by the Council's *Registrar*. The *Registrar* decides whether it is appropriate to refer the case either to the *Investigating Committee* or the *Fitness to Practise Committee*. In certain circumstances the Registrar can perform further investigation or dispose of cases. For example, when a case has a limited (or no) prospect of success.

The *Investigating Committee* does not hear oral evidence but considers all allegations made on paper and can make a number of decisions which include; disposing of a case, adjourning a case for further investigations, agreeing undertakings for improvement with a registrant or referring the case to the *Fitness to Practise Committee*.

Continued:

+ 'Registrants' are people or premises who are listed on the Council's register as qualified or licensed Pharmacists, Pharmacy Technicians or Pharmacies.

Equality Impact Assessment

Section One: General Information (continued):

1.5 What are the principal aims of the policy, service, function or project being assessed ? For example, why does this exist within the GPhC and what is it designed to achieve ?

In summary, the process for dealing with such allegations is as follows:
(continued)

Following 'initial screening', a case may be referred by either the *Registrar* or the *Investigating Committee*. to the *Fitness to Practise Committee*. This committee will examine the case and will ultimately decide how to proceed which can include case disposal, but may also be via a 'full hearing'.

A 'full hearing' is a meeting, generally held in public and follows strict legalistic procedures in relation to obtaining evidence, cross examination of witnesses etc as per other civil hearings and tribunal services in Great Britain.

The aim of a full hearing is to consider the evidence presented against defined '*Fitness to Practise Criteria*' and to rule:

- If the fitness to practise of a registrant is impaired.
- If an individual or a body corporate should be disqualified from inclusion within the Council's register of pharmacy retail premises.
- Whether further action should be taken in respect of criminal conduct.

As a result of a full hearing, the Committee will consider all evidence, announce its findings and ultimately decide on the appropriate sanction (if any) to impose on the registrant.

1.6 List the main activities of the policy, service, function or project being assessed

For example, what does it involve ? Are there any key milestones or achievements that can be measured as a result of its implementation ?

To set out the functions, procedures and remit of the Fitness to Practise Committee ('the Committee') of the General Pharmaceutical Council ('the Council').

In summary, the policy details:

- The three types of allegations considered by the Committee
- The rules that apply to all proceedings before the Committee
- The procedures and rules for issuing all documents
- The roles of the Registrar and the Investigating Committee
- Rules relating to the consideration of allegations by the Registrar, the Investigating Committee and the Fitness to Practise Committee.
- The burden of proof and standard of proof required
- Rules relating to how Fitness to Practise hearings are conducted and the different classes of hearings
- Rules and procedures relating to witnesses and the giving of evidence to the Committee
- Legal and technical representation
- The decision making powers of the Committee
- Rules relating to the awards of costs

The rules contained within this policy are in accordance with the powers given to the Council under various articles of the *Pharmacy Order 2010*.

Equality Impact Assessment

Section One: General Information (continued):

1.7 Who does this project involve and affect ?

Consider both the internal (employment) and external aspects.

For example, GPhC employees, members, pharmacists, pharmacy technicians, pharmacy owners, patients and other organisations or members of the public who have dealings with the GPhC.

- Council Employees.
- Registered Pharmacists, Pharmacy Technicians and Pharmacy Owners.
- Members of the public.
- Witnesses
- The Council's Registrar
- Members of the *Investigating* and *Fitness to Practise* committees.
- Persons acting in the capacity of clinical, legal or specialist advisors to any of the committees.

1.8 What are the key performance indicators of this policy, service, function or project

The principal aim of this policy is to ensure that all procedures relating to *Fitness to Practise* allegations, investigations and subsequent hearings are conducted in strict accordance with the rules laid out within this document.

Equality Impact Assessment

Section One: General Information (continued):

1.8 Was any *Equalities Research Data* utilised ✓

Yes

No

Equalities Research Data is internal or external information available in relation to equality that was taken into account in the development or implementation of the policy, service, function or project being assessed. Examples might include internal employment information, staff or pharmacists surveys or research, information from the *Equalities and Human Rights Commission etc.* Where you believe there are gaps in research please state what further research could or should be undertaken. Please include your recommendations within the *Further Actions* section of this document (section 4.0).

Please list any *Equalities Research Data* used below:

No evidence was available relating to the use of *Equalities Research Data* in the formulation of this policy.

A recommendation for the Council would be to capture and analyse the profile (by equality groups) of all allegations, investigations and case outcomes relating to a registrant's *Fitness to Practise*.

It is recommended that this information is captured and analysed by:

- Initial allegations (including types of allegation)
- The type of decisions reached by the Registrar, Investigating Committee and the Fitness to Practise Committee e.g. allegation upheld, dismissed, referred, etc.
- Sanctions imposed on registrants following Fitness to Practise investigations and hearings.

Continued

Equality Impact Assessment

Section One: General Information (continued):

Please list any *Equalities Research Data* used below (continued):

- The above 3 headers for analysis to be categorised by the six equality strands namely race, gender, disability, sexual orientation, religion/belief system and age

Capturing and analysing the above data would allow the Council to ascertain if any trends, in terms of equality, exist however coincidental or unintentional.

Where trends have been identified to account for any actions which will take place to positively promote equality and remove any adverse impacts.

For example, if the majority of allegations were upheld against people from the same racial grouping, the Council would need to be aware of this fact and consider if any proactive measures e.g., education and training would be appropriate.

Equality Impact Assessment

Section One: General Information (continued):

1.9 Who has been, or will be, consulted in the development or implementation of the policy, service, project or function being assessed ? Consultation should be with representatives of groups affected or directly involved. Please refer to Section 1.6 of this document for more information.

The Council has published (in accordance with *The Pharmacy Order 2010*) a set of draft rules which are currently the subject of consultation with the people most likely to be affected by the introduction of any new rules.

The consultation on the draft rules covers:

- Fees
- Registration
- Appeals
- Statutory committees and their advisers
- Fitness to Practise

There is a legal requirement (as part of *The Pharmacy Order*) that the Council must consult such persons or organisations that it considers appropriate before making rules under Parts 3 – 7 of the Order, and that rules cannot come into force until approved by order of the Privy Council (except in the case of the Fees rules).

Consultations on further sets of rules e.g. fees for 2011, continuing professional development and pharmacy owners and superintendents will take place later in 2010.

After the close of the consultation, the Council will review the outcome and ensure that any necessary amendments are made to the rules prior to seeking Privy Council approval and their coming into force. The consultation closes on 4 May 2010.

Equality Impact Assessment

Section Two: Screening Impact:

Assessing Positive Impact

Please tick *Yes* or *No* to the initial questions below

2.0 Could this policy, service, project or function have a major impact (*positive, negative or differential*) on GPhC employees, members, pharmacists, pharmacy Technicians/owners, members of the public or any other GPhC stakeholders ?

Yes No

2.1 Could this policy, service, project or function impact positively or differentially on any other different groups of people that have contact with the GPhC ?

Yes No

If you have answered *Yes* to either of the above questions, please complete Section 2.2. of this document (overleaf). Otherwise, please proceed to Section 2.3.

Equality Impact Assessment

Section Two: Screening Impact (continued) :

Assessing Positive Impact	
2.2 How does the policy, service, project or function impact positively on the following groups:	
Group:	Evidence:
Race	<p>This policy has a potentially positive impact on all persons who have contact with the Council in connection with an allegation of '<i>Fitness to Practise</i>'. This will apply to:</p> <ul style="list-style-type: none"> ▪ Cases screened, refereed or disposed of by the <i>Registrar</i>. ▪ Cases investigated by the <i>Investigating Committee</i>. ▪ Cases investigated or heard by <i>the Fitness to Practise Committee</i>. <p>In such circumstances, a person will have the matter presided over by a carefully appointed and suitably qualified individual or committee who are obliged to investigate all allegations of <i>Fitness to Practise</i> and conduct subsequent hearings in a fair and objective manner and to ensure that the principles of natural justice (civil standard) are adhered to.</p> <p>However, there is no reference made within this policy to the Council's commitment to fairness and inclusivity for the six equality strands. There needs to be a statement to this effect included.</p>
Gender	
Disability	
Sexual Orientation	
Religion / Belief	
Age	
Different Socio and Economic Groups	

Please now proceed to Section 2.4

Equality Impact Assessment

Section Two: Screening Impact (continued) :

2.3 Please state why, in your assessment, you consider that the policy, service, project or function is likely to have no *Positive Impact on Equality Groups*. Please attach evidence to support your assessment.

Not applicable.

Equality Impact Assessment

Section Two: Screening Impact (continued) :

Assessing Adverse Impact

Please tick Yes or No to the following questions and where available, provide evidence to support your answers.

2.4 Could this policy, service, project or function impact adversely or differentially on different equality groups ?

<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Yes No

Do people from different equalities groups have different expectations and needs of or from this policy, project service or function ?

<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Yes No

Is there evidence that any part of the policy, project, service or function could discriminate unlawfully either directly or indirectly against any equality groups ?

<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Yes No

If you have answered yes to any of the above questions, please complete Section 2.5. of this document (overleaf) otherwise, please proceed to Section 2.6

- 2: Adversely impact is where the affect or impact of the policy, service, project or function results in less favourable treatment, discrimination or disadvantage which may be direct, indirect or not immediately obvious and is not capable of being justified.
- 3: Equality groups are people of a different *Race, Gender, Religion/Belief, Sexual Orientation, Age Disabled* people and people drawn from different *Socio and Economic* groupings. Note that at the time of writing, the assessment of *Socio and Economic Groupings* should be performed at a 'strategic level only'¹.

1 Draft Government Guidelines on Interpreting the Equality Bill 2010

Equality Impact Assessment

Section Two: Screening Impact (continued) :

2.5 How does the policy, service, project or function adversely impact on the following groups:

Group:	Evidence:
Race	<p>The policy does not appear to take into account circumstances where the quality of evidence given by either appellants or witnesses may be adversely affected on the grounds that a person may not speak English or for whom English is not their first language. It is acknowledged as this being more likely with witness evidence as there may be a minimum level of spoken and written English which is required by appellants in order to practise pharmacy.</p> <p>Whilst the policy does state that an appellant may be accompanied by a 'Supporter' (Rule 43 (3) (a) and (b)), the policy additionally states that the <i>"Supporter can only accompany an appellant who is not (otherwise) represented and may only be entitled to address the Committee with the permission of the chair."</i></p> <p>It is recommended that the policy either be revised or supplementary information produced to clarify the position relating to the use of interpreters as part of Committee proceedings and hearings.</p>

Section Two: Screening Impact (continued) :

2.6 How does the policy, service, project or function adversely impact on the following groups:

Group:	Evidence:
Race (continued)	<p>For those who are claiming 'lack of fitness to practise' who do not speak or write English an alternative in terms of providing written evidence may be for someone to take down the evidence face to face or over the phone, or if the individual is comfortable with this to provide taped oral evidence and take down written notes to accompany this.</p> <p>It is acknowledged that the use of interpreters is currently specifically listed within the policy in section 47(3)(c), but this would appear to only apply to 'Vulnerable Witnesses' and therefore does not extend to accommodate issues of <i>Race</i> or language barriers on the grounds of <i>Race</i>.</p> <p>A further recommendation would be the production of this policy in other languages – especially where it has been identified by the Council that a number of appellants or witnesses are commonly drawn from particular countries or regions. There is a standard level of minimum 'other languages' which is approx 14 languages which could be indicated. This is available from the Equality and Human Rights Commission.</p>
Gender	<p>The timing of hearings to acknowledge pregnancy commitments or childcare arrangements for women. Also some women (particularly Muslim community) may not feel comfortable with the make up of the investigatory/hearing panel if all male</p>

2.7 How does the policy, service, project or function adversely impact on the following groups:

Group:	Evidence:
Disability	<p>It would appear that any <i>Fitness to Practise</i> allegations must be made in writing. Additionally, the policy explicitly states that the Investigating Committee (effectively the second stage in assessing many <i>Fitness to Practise</i> allegations) may not hear oral evidence (11)(2).</p> <p>This rule represents a risk of direct discrimination to people who have certain visual or mental impairments and may have difficulty accurately conveying their allegation on paper. Whilst on balance, this is less likely to apply to Council registrants, there is a risk that it could adversely affect witnesses and informants with disabilities.</p> <p>Whilst oral evidence is (obviously) accepted at hearings, it is recommended that the policy be amended to explicitly state the circumstances when oral evidence will be accepted by the Council from witnesses and informants in connection with <i>Fitness to Practise</i> allegations outside of a full hearing.</p> <p>Consideration should also be given to those with low literacy levels who do not feel comfortable or are unable to provide evidence in writing. Similar to race, someone to translate from oral evidence into written evidence or to tape evidence with clear acceptance that this route of communication is acceptable.</p>

Section Two: Screening Impact (continued) :

2.8 How does the policy, service, project or function adversely impact on the following groups:

Group:	Evidence:
Disability (continued)	<p>The fitness to practise criteria (15)(3)(a)-(m) list conditions that potentially fall within the scope of the <i>Disability Discrimination Act (1995)</i>. (<i>DDA</i>).</p> <p>It is noted that a 'Fitness to Practise' judgement is primarily an objective matter i.e. a person is either capable of practising or not. It is also acknowledged that where a registrant's fitness to practise is impaired, a risk to the health and safety of both the registrant and members of the public is also prevalent.</p> <p>However the above circumstances may not automatically negate the Council's responsibility under the <i>DDA</i> and any judgement made in respect of a registrant on the grounds of their disability, carries with it, a risk of less favourable treatment which would not necessarily apply to a non disabled person.</p> <p>It is therefore recommended that the Council reviews its duty under the <i>DDA</i> to make reasonable adjustments to people with disabilities and amend the policy to explicitly state the adjustments it is prepared to consider where the fitness to practise of a registrant is impaired on the grounds of their disability.</p> <p>Whilst the exact details of such measures fall outside of the scope of this Equality Impact Assessment, an example might include allowing an early review of disqualifications. It is also recommended that when reporting its findings and making a judgement, the Council states the 'reasonable adjustments' that were considered as part of the decision making process.</p>

Section Two: Screening Impact (continued) :

2.9 How does the policy, service, project or function adversely impact on the following groups:

Group:	Evidence:
Disability (continued)	<p>The policy includes specific references as to how the Committee will accommodate the needs of vulnerable witnesses and this includes people with both mental and physical disabilities. (47)</p> <p>Three advisory points are made relating to this policy in respect of disability.</p> <p>1: The Council amends the policy to explicitly state a list of 'special measures' (reasonable adjustments) it will make to accommodate a person's disability in both formal communications and during <i>Fitness to Practise</i> (FTP) hearings. The benefits of this statement being two fold:</p> <ul style="list-style-type: none"> (i) Disabled people involved with the Council's FTP process clearly understand the support available to them. (ii) Members of the Committee understand their own obligations and the options available to them to accommodate the needs of disabled people. (The policy currently states that "<i>The Committee may adopt such measures as it considers necessary to enable it to receive evidence from a vulnerable witness</i>"(47)(2). This statement is rather vague and is ultimately reliant upon the Committee members' own knowledge of appropriate disability adjustments.

Section Two: Screening Impact (continued) :

<p>2.10 How does the policy, service, project or function adversely impact on the following groups:</p>	
<p>Group:</p>	<p>Evidence:</p>
<p>Disability (continued)</p>	<p>Advisory Comments (continued)</p> <p>2: All documentation produced by the Council relating to the FTP process is produced in different formats – especially large print.</p> <p>3: Appellants and witnesses are asked to declare if they have a disability when initial FTP proceedings are commenced. This could be particularly relevant where an FTP case is being determined 'on paper' (e.g. by the Investigating Committee) as people with certain mental impairments may find it difficult to express themselves on paper and this may adversely affect the quality of evidence presented to the Committee.</p>
<p>Sexual Orientation</p>	<p>No adverse impacts identified. Although training regarding unintentional homophobic comments should be provided to those involved.</p>
<p>Religion / Belief</p>	<p>Consideration to be given for religious holidays or festivals and for hearings not to be held on these days.</p> <p>A general action point would be to provide Equality and Diversity training to be provided to those involved in hearings.</p>

Section Two: Screening Impact (continued) :

2.11 How does the policy, service, project or function adversely impact on the following groups:	
Group:	Evidence:
Age	<p>The fitness to practise criteria (15)(1)-(5) which may be used to decide, in the case of registrants, whether or not the requirements as to fitness to practise are met or not include:</p> <p><i>"The Registrants Age at the time the conduct or behaviour took place"</i>(15)(2)(k).</p> <p>There is a risk that this criteria, prima facia, could contravene UK Age Discrimination legislation (2006) it is recommended that this criteria either be removed or specialist advice obtained relating to its use.</p> <p>Those attending hearings of more mature years may have a disability (re the DDA non accident or genetic disabilities are more likely to apply to individuals over the age of 45)</p>
Different Socio and Economic Groups	<p>Advisory comment. Whilst the awards of costs and expenses are determined post all <i>Fitness to Practise</i> hearings, the Council may wish to consider a separate policy of providing assistance to socio and economically disadvantaged informants and witnesses to ensure that people are not potentially excluded from the Council's <i>Fitness to Practise</i> process on the grounds of their Socio and Economic Status.</p>

Please now proceed to Section 3.0

Equality Impact Assessment

Section Two: Screening Impact (continued) :

2.12 Please state why, in your assessment, you consider that the policy, service, project or function is likely to have no *Adverse Impact on Equality Groups*. Please attach evidence to support your assessment

Not applicable.

Equality Impact Assessment

Section Three: Promoting Inclusivity:

3.0 How does this policy, project, service or function contribute towards the provision of fair and equal treatment to all people who have contact or dealings with the GPhC as detailed within the GPhC Equality and Diversity Policy:

With the exception of the potential risks of inequality identified as part of this Equality Impact Assessment, the *Fitness to Practise* process allows all informants, witnesses and accused registrants the opportunity to state their case via a process or hearing conducted by legally and professionally qualified individuals operating in an objective capacity on behalf of the Council.

Equality Impact Assessment

Section Three: Promoting Inclusivity (continued) :

3.2 How will you ensure that this policy, project service or function is continuously communicated to and available to all equality groups?

As detailed within the action planning section of this document, it is recommended that the Council consider publishing this document in a number of different formats and languages to accommodate the needs of its diverse population of employees, committee members and service users.

3.3 Is there an opportunity to promote equality and diversity in developing this policy? Please explain.

In its existing format, the policy itself does not necessarily 'promote' equality.

The implementation of the action points recommended as part of this *Equality Impact Assessment* will allow the Council to promote equality issues to a greater extent within this policy.

The monitoring of the equality profiles of registrants accused of *Fitness to Practise* issues and any equalities issues that transpire as a result of this Exercise, will allow the Council to consider further options for promoting equality as part of this process.

Equality Impact Assessment

Section Four: Further Actions:

4.1 What are your specific actions/recommendations to amend this policy/project/service (based on your responses to Sections 2 and 3).

	Proposed Action	Timescale	Responsible Lead	Measure/Outcomes
1:	Capture and analyse the profile, by equality groups, of all allegations, investigations and case outcomes relating to a registrants <i>Fitness to Practise (FTP)</i> as detailed on page six of this document			
2:	Revise the policy or produce supplementary information to clarify the position regarding the use of interpreters as part of Committee proceedings / hearings to meet the needs of people involved with FTP proceedings for whom English is not their first language.			

Section Four: Further Actions:

	Proposed Action	Timescale	Responsible Lead	Measure/Outcomes
3:	Produce this policy in other languages - especially where it has been identified by the Council that a number of appellants or witnesses are commonly drawn from particular countries or regions.			
4:	Amend the policy to state the circumstances when oral evidence will be accepted by the Council from witnesses and informants (involved with <i>Fitness to Practise</i> allegations outside of a full hearing) who have disabilities that may prevent them from accurately conveying information on paper.			
5:	Revise the policy to include a section which states the 'adjustments' the Council is prepared to consider where the fitness to practise of a registrant is impaired on the grounds of their Disability.			

Section Four: Further Actions:

4.2 What are your specific actions/recommendations to amend this policy/project/service (based on your responses to Sections 2 and 3).

	Proposed Action	Timescale	Responsible Lead	Measure/Outcomes
6:	Revised the policy to explicitly state a list of 'special measures' (reasonable adjustments) the Council will make to accommodate a person's disability in both formal communications and during FTP hearings.			
7:	Ensure all documents sent to witnesses and appellants are available in different formats – especially large print.			
8:	Request that appellants and witnesses declare if they have a Disability when initial FTP proceedings are commenced.			
9:	Remove or take specialist advice relating to the use of Age related FTP criteria. (See page 17 of this document.)			

Section Four: Further Actions:

4.3 What are your specific actions/recommendations to amend this policy/project/service (based on your responses to Sections 2 and 3).

	Proposed Action	Timescale	Responsible Lead	Measure/Outcomes
10:	Include within this document, reference to equality strands, fairness and inclusivity.			
11:	Monitor, record and review the composition of the FTP Committee – particularly in terms of Race and Gender.			
12:	Consider a separate policy of providing assistance to socio and economically disadvantaged people involved in FTP proceedings			
13	Provide Diversity and Equality Training to all Council employees involved in FTP hearings.			

Section Four: Further Actions:

4.4 What are your specific actions/recommendations to amend this policy/project/service (based on your responses to Sections 2 and 3).

	Proposed Action	Timescale	Responsible Lead	Measure/Outcomes
10:	Provide training regarding unintentional homophobic comments and behaviours for all Council employees involved with FTP proceedings			
11:	Consideration should also be given within this policy to those with low literacy levels who may not feel comfortable or are unable to provide evidence in writing			
12:	The policy should consider timing of hearings to acknowledge pregnancy commitments or childcare arrangements for women and the fact that some women (particularly Muslim community) may not feel comfortable with the make up of the investigatory/hearing panel if all male			

Section Four: Further Actions:

4.5 What are your specific actions/recommendations to amend this policy/project/service (based on your responses to Sections 2 and 3).

	Proposed Action	Timescale	Responsible Lead	Measure/Outcomes
13:	Consider publishing this policy in the 'standard level' of minimum 'other languages' (approx 14) available from the <i>Equality and Human Rights Commission</i> .			
14:	For those who are claiming 'lack of fitness to practise' who do not speak or write English, provide an alternative method of providing written evidence e.g. telephonic or face to face interviews			

Equality Impact Assessment

Section Four: Further Actions: (continued) :

4.6 How do you intend to monitor and report on the impact of the project, policy, service or function and the associated recommendations and actions ?

Via both the consultation process and agreed period of reviews of the action points raised as part of this and other Equality Impact Assessments performed within the Council.

Equality Impact Assessment

Section Five: Assessment Approval:

5.1 This Equality Impact Assessment has been completed by:

Signed **Date.....**

This Equality Impact Assessment has been examined and is approved / signed off on behalf of the GPhC

Signed **Date.....**

Notes:

Completed assessments must be sent to: