

Equality, Good Relations and Human Rights Screening Template

*****Completed Screening Templates are public documents and will be posted on the Trust's website*****

See 'Equality, Good Relations and Human Rights Screening Guidance Notes' (on SharePoint) for further background information on the relevant legislation and for help in answering the questions on this template.

(1) Information about the Policy/Proposal

(1.1) Name of the policy/proposal

Provision of free period products in Southern Health and Social Care Trust - in line with The Period Products (Free Provision) Act (Northern Ireland) 2022.

(1.2) Is this a new, existing or revised policy/proposal?

New

(1.3) What is it trying to achieve (intended aims/outcomes)?

The Period Products (Free Provision) Act (Northern Ireland) 2022 aims to ensure '*period products are provided free of charge to all persons in Northern Ireland who need them*'.

This equality screening relates to the implementation of this Act within Southern Health and Social Care Trust. This will mean that period products will be provided, free of charge, in Trust premises.

In line with the Act and guidance from Department of Health (DoH), is intended that this proposal will be fully implemented in a phased approach.

As a first stage the Trust will have 2 products which are currently available through a compliant procurement process, i.e. tampons and /or sanitary pads, available on larger sites with high footfall patient, staff and visitors – see Table 1. The Trust will install dispensers in female/gender neutral/disabled public toilets on these sites and the products in these dispensers will be ordered and refilled by Trust Support Services staff. This will ensure that products are available in June 2025, in places with the highest footfall in keeping with the ethos of the legislation.

The availability of products will be rolled out to other Trust premises by the 31 August 2025 alongside signage and guidance for staff on product re-ordering and replenishment. These arrangements will be kept under review.

Background

In October 2021, the Period Products (Free Provision) Bill was introduced in the Northern Ireland Assembly to address “... *an undeniable need to provide sustained free access to period products in education settings and other public buildings*”. The Bill had broad support in the Assembly and received Royal Assent on 12 May 2022.

The Period Products (Free Provision) Act (Northern Ireland) 2022 defines and requires ‘Specified Public Services Bodies’ to establish and maintain arrangements to ensure that period products are obtainable, free of charge, on their premises in Northern Ireland. The Department of Health defines Specified Public Services Bodies under the DoH Period Products Regulations as follows:

- Belfast HSC Trust
- Northern HSC Trust
- Southern HSC Trust
- South eastern HSC Trust
- Western HSC Trust.

Each of these bodies will have a statutory duty to provide period products free of charge on their premises. Furthermore, the Act specifies that arrangements established to meet this aim must ensure the following:

- that the period products are obtainable, by users, reasonably easily and in a way that respects the dignity, privacy and confidentiality of the persons obtaining them
- that a reasonable choice of different types of period products are made available, having regard to articles which are reusable
- that the availability of free products and the arrangements for obtaining them are publicised in a way that respects dignity, privacy and confidentiality.

This proposal recognises there may be a range of factors which contribute to (or detract from) menstrual health including, for example, socio-economic and or/environmental factors. It is expected that having access to free period products (for those who need and use them) will support:

- overall menstrual health and hygiene
- dignity, privacy, confidentiality and comfort for all who use the products
- convenience (as products will be available within Trust facilities and to all service users, carers and staff (removing the need to travel if menstruation begins, for example, unexpectedly))
- removing the economic cost of purchasing period products for those who are be unable to do so
- reducing stigma which may exist around menstrual health
- supporting health and social wellbeing for those who need and use period products
- the provision of compassionate and person-centred care in the Trust

Communication

A ‘Task and Finish’ Group was established in the Trust to develop, implement, monitor and review the proposal. A range of communication methods will be used to actively communicate with service users, carers and staff. A regional engagement exercise was undertaken by all HSC Trusts and took place from 18 November 2024 until Tuesday 31 December 2024. The form of the engagement exercise was a confidential survey which invited views from a wide range of stakeholders, including patients and service users, carers, staff and the general

public. The confidential survey explored a range of topics covering different types of period products that could be made available, and preferred methods to obtain (and locations to access) the products and if respondents felt that providing the products free of charge would be of benefit. A total of 2,665 responses were received by all HSC Trusts as an outcome of the engagement exercise.

Feedback from the outcome of the engagement survey has been used to shape how the Trust implements the requirements of the Act. There was overall support for the provision of free period products along with the sentiment that the Trust should also ensure 'value for money' where possible.

Communication will focus on providing clear information about where and how to access products for those who need and use them. Communication with staff will also take place regarding provision, replenishment and management arrangements.

The Trust is committed to implementing this proposal which aims to support those who need and use period products, in line with HSC values.

(1.4) Are there any Section 75 categories which might be expected to benefit from the intended policy/proposal?

- **Persons of different age:**

Menstruation usually begins between the ages of 12 and 15. Menstruation stops occurring after menopause, which usually occurs around the age of 51.

Thus, the policy might be expected to benefit people over the age of 12 (approximately) and under the age of 51 (approximately).

- **[Men and] women generally:**

Provision of free period products will have a positive impact on citizens, irrespective of their gender identity. It will support and increase confidence in managing periods and being able to carry out normal activities during menstruation without the fear of not having access to period products.

(1.5) Who owns and who implements the policy/proposal - where does it originate, for example DoH, HSCB, the Trust?

Department of Health (regional implementation)
Southern Health and Social Care Trust

(1.6) Are there any factors that could contribute to/detract from the intended aim/outcome of the proposal (Financial, legislative or other constraints?)

- Financial constraints - at this time no funding has been made available to the Trust for the above. In such circumstances, where funding has not been allocated, there is no ability to fund from existing resource nor any potential to repurpose current expenditure, any associated costs would be considered unfunded costs pressures.
- Uncertainty regarding volume of products required (particularly in early stages of

implementation for planning purposes)

- Monitoring uptake of products
- Ensuring free period products are available in all locations and that supply is regularly replenished

(1.7) Who are the internal and external stakeholders (actual or potential) that the policy/proposal/decision could impact upon? (E.g. staff, service users, other public sector organisations, trade unions, professional bodies, independent sector, voluntary and community groups etc.

- Patients who use Trust services
- Service users who use Trust services
- Carers who use Trust services
- Visitors who use Trust services
- Trust Staff
- Trade Unions
- Independent Community & Voluntary Sector organisations
- Department of Health
- Procurement and Logistics (relating to supply)

(1.8) Other policies with a bearing on this policy/proposal (for example regional policies) - what are they

- [Period Products \(Free Provision\) Act \(Northern Ireland\) 2022](#)
- [Period Products \(Free Provision\) Act \(Northern Ireland\) 2022 - Guidance to DfI's Specified Public S](#)
- Northern Ireland Executive *Draft Programme for Government 2024-2027* - [Our Plan: Doing What M](#)
- Northern Ireland Executive *Child Poverty Strategy* - [Child Poverty Strategy](#)
- Northern Ireland Executive *Children and Young People's Strategy* - [final-executive-children-and-yo](#)
- Northern Ireland Executive *Ending Violence Against Women and Girls Strategy* - [Strategic Framew](#)
- Housing Executive Northern Ireland Report *The Homeless Response to Covid-19* - [Homelessness](#)
- Department of Health Northern Ireland *Mental Health Strategy (2021-2023)* - [doh-mhs-strategy-202](#)
- Trust Equality Scheme

(2) Available evidence

Evidence to help inform the screening process may take many forms. What evidence/information (both qualitative and quantitative) have you gathered to inform this policy?

2.1 Staff Affected by this Policy/Proposal / 2.2 Composition of Southern Trust Workforce – free period products can be made available for all staff who require them.

| Section 75 Group | <i>Southern Trust Workforce Profile as at 1 January 2025</i> | <i>Percentage</i> |
|--|--|--------------------------|
| Gender | Female | 85.6% |
| | Male | 14.4% |
| Religion | Protestant | 34.1% |
| | Roman Catholic | 55.9% |
| | Neither | 10.0% |
| Political Opinion | Broadly Unionist | 8.9% |
| | Broadly Nationalist | 9.7% |
| | Other | 7.4% |
| | Do Not Wish To Answer/Not Known | 74.0% |
| Age | 16-24 | 6.7% |
| | 25-34 | 22.5% |
| | 35-44 | 27.9% |
| | 45-54 | 21.2% |
| | 55-64 | 17.8% |
| | 65+ | 3.9% |
| Marital Status | Single | 31.7% |
| | Married | 56.8% |
| | Not Known | 11.5% |
| Dependent Status | Caring for a Child/Children / Dependant Older Person / Person With a Disability | 14.7% |
| | None | 31.3% |
| | Not Known | 54.0% |
| Disability | Yes | 2.6% |
| | No | 73.9% |
| | Not Known | 23.5% |
| Ethnicity | Bangladeshi | 0.01% |
| | Black African | 0.45% |
| | Black Caribbean | 0.01% |
| | Black Other | 0.03% |
| | Chinese | 0.09% |
| | Filipino | 0.6% |
| | Indian | 1.2% |
| | Irish Traveller | 0.01% |
| | Mixed Ethnic | 0.2% |
| | Pakistani | 0.15% |
| | White | 74.2% |
| | Not Known | 23.0% |
| Sexual Orientation towards: | Opposite Sex | 57.9% |
| | Same Sex | 1.03% |
| | Same and Opposite Sex | 0.26% |
| | Do Not Wish To Answer/Not Known | 40.81% |

2.3 Patients / Clients Affected / 2.4 Southern Trust's Area Population Profile – Census 2021 - period products can be provided free of charge to all service users who need them.

| Section 75 Group | Trust's Area Population Profile (Population of 358,034) | Percentage |
|--|--|--|
| Gender | Female | 50.2 |
| | Male | 49.8 |
| Religion | Protestant | 35.5 |
| | Roman Catholic | 57.0 |
| | Other | 7.5 |
| Political Opinion | Not collected | |
| Age | 0-15 | 22.5 |
| | 16-24 | 10.2 |
| | 25-44 | 26.5 |
| | 45-64 | 25.2 |
| | 65-84 | 13.8 |
| | 85+ | 1.8 |
| Marital Status (aged 16+ years) | Single | 28.1 |
| | Married/Civil Partnership | 37.7 |
| | Other | 34.2 |
| Dependent Status | Caring for a dependent Child/Children | 25.8% care for a dependent child/children |
| Disability | Yes | 21.8 |
| | No | 78.2 |
| Ethnicity | Asian Other | 0.4 |
| | Bangladeshi | 0 |
| | Black African | 0.4 |
| | Black Caribbean | 0 |
| | Black Other | 0.4 |
| | Chinese | 0.3 |
| | Filipino | 0.1 |
| | Indian | 0.2 |
| | Irish Traveller | 0.3 |
| | Mixed Ethnic Group | 0.8 |
| | Arab | 0.1 |
| | Roma | 0.1 |
| | Other | 0.2 |
| | Pakistani | 0.1 |
| | White | 96.5 |
| Sexual Orientation | Heterosexual | 69.8 |
| | LGBTQ+ | 1.1 |
| | Not Stated | 29.1 |

(3) Needs, experiences and priorities

(3.1) Taking into account the information above what are the different needs, experiences and priorities of each of the Section 75 categories and for both service users and staff.

Southern Health and Social Care Trust is committed to ongoing monitoring for any adverse impact on all of the nine protected categories detailed in this section.

| Section 75 Category | Available Evidence | |
|----------------------------|---|--|
| | Staff | Service Users |
| Gender | This proposal, to provide free period products for all who need and use them is intended to have a positive impact. It is not anticipated that there will be any differential or adverse impact of this proposal on Trust staff. It is planned that implementation will take place across the Trust to align with The Period Products (Free Provision) Act (Northern Ireland) 2022. | <p>Provision of free period products will have a positive impact on citizens, irrespective of their gender identity. It will support and increase confidence in managing periods, and to carry out normal activities during menstruation.</p> <p>The Trust recognises that this proposal will also benefit women generally. Access to products is planned to be available in a range of commonly used and gender neutral settings. This supports an ethos of ensuring equality of access to the products for all users who need them.</p> |
| Age | As above | <p>Free period products will have a positive impact on citizens, irrespective of their age. Although citizens of menstruating age will benefit directly from the provision. Their households may also be indirect beneficiaries as the provision of free period products may result in financial savings and help to ease pressures on household budgets.</p> <p>The provision will support and increase confidence in managing periods, and to carry out normal activities during menstruation.</p> <p>The NHS reports the average age for a period to start as approximately 12 years of age, however, this can vary. (Starting your periods - NHS) The NHS also reports that periods will continue until an approximate age of 51 years old. Periods - NHS</p> <p>Using latest Northern Ireland census data for age and men and women generally it could be assumed that approximately 36% of people in Northern Ireland will currently be users of period products. Provision of period products, free of charge, is expected to have a positive impact on and those</p> |

| Section 75 Category | Available Evidence | |
|----------------------------|---------------------------|---|
| | Staff | Service Users |
| | | who need them (within the approximate age range of 12 – 51 years). This initiative will be open to all who need and use period products. It is intended that items will be available in SHSCT locations. |
| Religion | As above | It is not anticipated that there will be any differential or adverse impact of this proposal on the grounds of religion. |
| Political Opinion | As above | It is not anticipated that there will be any differential or adverse impact of this proposal on the grounds of political opinion. |
| Marital Status | As above | In some cases, husbands or partners may wish to access products on behalf of others. It is not anticipated that there will be any differential or adverse impact of this proposal on the grounds of marital status. |
| Dependent Status | As above | The Trust recognises the significant and vital contribution that unpaid and family carers make in our communities. Carers NI State of Caring Survey (2022) cni-soc22web.pdf found that: <ul style="list-style-type: none"> - 82% of carers identified as female - 17% of carers identified as male In terms of age, the same survey reported: <ul style="list-style-type: none"> - 4% of carers are aged 25-34 - 17% of carers are aged 35-44 - 33% of carers are aged 45-54 - 31% of carers are aged 55-64 - 14% of carers are aged 65+ It is not anticipated that there will be any differential or adverse impact of this proposal on the grounds of dependents. |
| Disability | As above | It is estimated that approximately 24% of the Northern Ireland population have a disability, affecting almost 37% of households. Women, on average, live longer than men (<i>National Institutes of Health - New Perspective on Why Women Live Longer Than Men</i>) |

| Section 75 Category | Available Evidence | |
|----------------------------|---------------------------|---|
| | Staff | Service Users |
| | | <p>), therefore, disability tends to be more common among women.</p> <p>The Trust recognises that disabled people are statistically more likely to use our services. It is anticipated that providing free period products to all service users, carers and staff who need them will have a positive impact on overall menstrual health for all who use period products, including those with a disability and those without.</p> |
| Ethnicity | As above | <p>It is not anticipated that there will be any differential or adverse impact of this proposal on the grounds of ethnicity.</p> <p>The written statement highlighting the locations where products are available can be made available in a range of languages and formats as required.</p> |
| Sexual Orientation | As above | <p>It is not anticipated that there will be any differential or adverse impact of this proposal on the grounds of sexual orientation.</p> |

(3.2) Provide details of how you have involved stakeholders, views of colleagues, service users and staff etc when screening this policy/proposal.

A regional involvement and consultation survey has been developed to ascertain the views of stakeholders. Feedback is being invited from a wide range of stakeholders including staff, service users, carers, visitors and others and this will inform and support decision-making on the most appropriate and deliverable period product service.

In accordance with the legislation a written statement has been prepared and will be published on our website under the Publications section.

(4) Screening Questions

You now have to assess whether the impact of the policy/proposal is major, minor or none. You will need to make an informed judgement based on the information you have gathered.

| (4.1) What is the likely impact of equality of opportunity for those affected by this policy/proposal, for each of the Section 75 equality categories? | | | |
|---|---|---|--|
| Section 75 category | Details of policy/proposal impact | | Level of impact? Minor/major/none |
| | Staff | Service Users | |
| Gender | The policy is likely to have benefits for people who menstruate. | The policy is likely to have benefits for people who menstruate. | Minor (Positive) |
| Age | The policy is likely to have benefits for people of menstruating age, particularly younger people who may have lower incomes and may be less able to afford to purchase products. | The policy is likely to have benefits for people of menstruating age, particularly younger people who may have lower incomes and may be less able to afford to purchase products. | Minor (Positive) |
| Religion | None | None | None |
| Political Opinion | None | None | None |
| Marital Status | None | None | None |
| Dependent Status | Increasing the availability of free products may be beneficial for those with dependents who may have less free time to access products or greater pressures on their household income. | Increasing the availability of free products may be beneficial for those with dependents who may have less free time to access products or greater pressures on their household income. | Minor (Positive) |
| Disability | The increased availability of accessible products may afford people with disabilities easier and more discrete access to them, enhancing their independence. | The increased availability of accessible products may afford people with disabilities easier and more discrete access to them, enhancing their independence. | Minor (Positive) |
| Ethnicity | None | None | None |
| Sexual Orientation | None | None | None |

| (4.2) Are there opportunities to better promote equality of opportunity for people within Section 75 equality categories? | |
|--|--------------------------------------|
| Section 75 category | <i>Please provide details</i> |
| Gender | No |
| Age | No |
| Religion | No |
| Political Opinion | No |
| Marital Status | No |
| Dependent Status | No |
| Disability | No |
| Ethnicity | No |
| Sexual Orientation | No |

| (4.3) To what extent is the policy/proposal likely to impact on good relations between people of different religious belief, political opinion or racial group? minor/major/none | | |
|---|---|--|
| <i>Good relations category</i> | <i>Details of policy/proposal impact</i> | <i>Level of impact Minor/major/none</i> |
| Religious belief | None. | None. |
| Political opinion | None. | None. |
| Racial group | None. | None. |

| (4.4) Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group? | |
|--|--|
| <i>Good relations category</i> | <i>Please provide details</i> |
| Religious belief Political opinion Racial group | <p>All Trust staff are required to complete mandatory Equality, Human Rights and Good Relations training which includes reference to the Good Relations duty.</p> <p>The Trust will ensure that all services and all facilities are welcoming to all service users, carers and advocates - regardless of their</p> |

religious belief, political opinion and racial group.

Appropriate and inclusive means of communication will be used to communicate with service users and carers who may not be fluent in English.

(5) Consideration of Disability Duties

(5.1) How does the policy/proposal encourage disabled people to participate in public life and promote positive attitudes towards disabled people?

The Trust takes the following measures to meet our disability duties:

- Appropriate and inclusive means of communication will be used, to communicate with our service users, carers and staff.
- As with the application of any policy or practice, staff will be mindful of any reasonable adjustments that may be required in the implementation of this proposal for service users and carers.
- All Health and Social Care staff are required to undertake mandatory equality training, which includes disability duties.

Furthermore, the provision of free period products will take place across locations in the Trust therefore promoting equitable access. Products will be made available in a way that is accessible and which promotes dignity, privacy and confidentiality.

(6) Consideration of Human Rights

The Trust has a duty to act compatibly and must take Human Rights considerations into account in its day-to-day functions/activities.

(6.1)

How does the policy/proposal impact on Human Rights? Complete for each of the articles
Complete for each of the articles

| Article | Positive impact | Negative impact = human right interfered with or restricted | Neutral impact |
|---|-----------------|---|----------------|
| Article 2 – Right to life | | | X |
| Article 3 – Right to freedom from torture, inhuman or degrading treatment or punishment | | | X |

| Article | Positive impact | Negative impact = human right interfered with or restricted | Neutral impact |
|--|-----------------|---|----------------|
| Article 4 – Right to freedom from slavery, servitude & forced or compulsory labour | | | X |
| Article 5 – Right to liberty & security of person | | | X |
| Article 6 – Right to a fair & public trial within a reasonable time | | | X |
| Article 7 – Right to freedom from retrospective criminal law & no punishment without law | | | X |
| Article 8 – Right to respect for private & family life, home and correspondence. | X | | |
| Article 9 – Right to freedom of thought, conscience & religion | | | X |
| Article 10 – Right to freedom of expression | | | X |
| Article 11 – Right to freedom of assembly & association | | | X |
| Article 12 – Right to marry & found a family | | | X |
| Article 14 – Prohibition of discrimination in the enjoyment of the convention rights | | | X |
| 1 st protocol Article 1 – Right to a peaceful enjoyment of possessions & protection of property | | | X |
| 1 st protocol Article 2 – Right of access to education | | | X |

Please note: If you have identified potential negative impact in relation to any of the Articles in the table above, speak to your line manager and/or Equality Unit on tel: 028 375 64151. It may also be necessary to seek legal advice.

| | |
|-------|---|
| (6.2) | Please outline any actions you will take to promote awareness of human rights and evidence that human rights have been taken into consideration in decision making processes. |
| | N/a |

(7) Screening Decision(7.1) Given the answers in Section 4 of this template, how would you categorise the impacts of this decision or policy/proposal? *(Please tick one option below and list your reasons for the decision in 7.2 below)*

(7.1) Given the answers in Section 4 of this template, how would you categorise the impacts of this decision or policy/proposal? *(Please tick one option below and list your reasons for the decision in 7.2 below)*

| Major impact | | EQIA Required? <i>(Delete as appropriate)</i> | |
|--------------|----------------|---|-----------------------------|
| | | Yes | <u>No</u> |
| Minor impact | Minor positive | Mitigation Required | Alternative Policy Required |
| | | Yes/ <u>No</u> | Yes/ <u>No</u> |
| No impact | | Screened Out | |

(7.2) Please give reasons for your decision and detail any mitigation or alternative policies considered.

This proposal is to provide access to free period products in SHSCT locations to users of period products who need them. The proposal is expected to have a minor (and potentially positive impact) on a number of Equality categories.

The roll out of the free period products within the Trust will be kept under review, including:

- Involvement and consultation with stakeholders
- Using feedback from stakeholders to inform implementation arrangements as appropriate
- Development and display of a posters, to explain how to access the products
- Development of a written statement which, following Department of Health guidance, will include, for example: details of the consultation exercise with stakeholders and the agreed arrangements (for the provision of free period products) which have been established. The written statement can be made available in a range of languages and formats as required.
- Ensuring that period products are made available in a way that promotes and respects a person's right to privacy and dignity

The proposed arrangements will be kept under review and any feedback / comments / complaints dealt with in a sensitive manner and will inform future learning.

(7.3) Do you consider the policy/proposal needs to be subjected to ongoing screening? NB: for strategies/policies that are to be put in place through a series of stages – screen at various stages during implementation.

| | |
|-----|---|
| Yes | X |
| No | |

(8) Monitoring

(8.1) Please detail how you will monitor the effect of the policy/proposal for equality of opportunity and good relations, disability duties and human rights?

The Trust is committed to the effective monitoring of this policy.

Monitoring will take place by undertaking the following steps:

- Feedback from all stakeholders (including: service users, carers, visitors, staff)
- Assessing and monitoring demand and uptake
- Financial monitoring (cost of supply)

Approved Lead Officer:

Dawn Ferguson

Position:

Interim Executive Director of Nursing, Midwifery, AHP's
and Functional Support Services

Email:

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Date:

10 April 2025

Policy/proposal screened by:

Anita Carroll
Cathy Lavery, Head of EDI

Please forward completed screening template to Equality.Unit@southerntrust.hscni.net for inclusion in the Trust's Policy Screening Reports which are uploaded to the Trust's website.