Southern Health and Social Care Trust
Quality Care - for you, with you

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

Food Allergens Management Policy

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

New Policy

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

The purpose of this policy is to provide guidance for relevant staff on the management of food related allergens to ensure the provision of safe food and beverages for service users (Children and Adults), staff and visitors.

The aim is to reduce the risk of a service user, staff or visitor experiencing an adverse reaction from a known food allergen found in food or beverages.

This policy will also set out the training required by staff to help manage allergens.

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

All Section 75 categories and in particular those staff, patients/service users and visitors with or suspected of having food allergies/intolerance.

This policy applies to all staff (including Trust, Agency, Work Placements and Volunteers) in the acute and community setting who have direct service user contact and staff involved in the provision of catering services. This will include the following:

- Staff that assist service users with menu selection.
- Staff involved in purchasing, storing, handling, preparing or serving food or beverages to service users.
- Staff that assist service users with the preparation of food and beverages including those in service users' homes.
- Staff who accompany service users to restaurants / cafes.

- Staff who assist service users with their shopping or purchase food for service users at local shops or takeaways.
- Staff that provide therapeutic cooking sessions or cooking sessions delivered in a community nutrition education programme.
- Staff who themselves have a food allergy.

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

This is a Trust policy which will assist with compliance with Food Labelling and Information Regulations.

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

Compliance with food safety training / education as appropriate

Awareness of those staff or patient/service user with a food allergy/intolerance

Cross-contamination of allergen free food in main production kitchens

Relevant staff having access to up-to-date information on allergens

Adherence to a HACCP Plan / Safe Catering Pack (food safety management system)

(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.)

Trust Management, staff, patients/service users and visitors.

Trust's Food Hygiene and Safety Committee

BSO Procurement

Food suppliers

(1.8) Other policies with a bearing on this policy/proposal **(**for example regional policies) - what are they and who owns them?

The Trust's Food Hygiene Policy

HACCP Plan / Safe Catering Pack and associated procedures

The Trust has a legal obligation to comply with the provisions and requirements of food safety legislation in particular:-

- Food Safety (NI) Order 1991 (as amended)

□ Food Hygiene Regulations (NI) 2006
□ General Food Regulations (NI) 2004
□ Food Information Regulations (NI) 2014
□ DoH: Estates Facilities Alert (EFA) 2020-001; Allergens Issues; Food Safety in the NHS Issued 29 January 2020
□ Food Standards Agency guidance
□ SafeFood guidance

(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? *NB: Specify the details for each of the Section 75 categories for any staff affected, the Trust Workforce, any patients/clients affected and the Trust general population in the following tables* ***if appropriate****.*

2.1 Staff Affected by this Policy/Proposal

*All staff, in particular those with or suspected of having food allergies/ intolerance - see table 2.2 for make-up of Southern Trust workforce.

Section 75 Group	*Make up of Staff Affected*	*Percentage*
Gender	Female Male	***see note above**
Religion	Protestant Roman Catholic Not Known/Other	
Political Opinion	Broadly Unionist Broadly Nationalist Other Do Not Wish To Answer/Not Known	
Age	16-24 25-34 35-44 45-54 55-64 65+	
Marital Status	Single Married/Civil Partnership Other/Not Known	
Caring Responsibility	Caring for a Child/Children/Dependant Older Person/Person(s) With a Disability None Not Known	
Disability	Yes No Not Known	
Ethnicity	Bangladeshi Black African Black Caribbean	

	Black Other Chinese Filipino Indian Irish Traveller Mixed Ethnic Pakistani White Not Known	
Sexual Orientation *towards:*	Opposite Sex Same Sex Same and Opposite Sex Do Not Wish To Answer/Not Known	

2.2 Composition of Southern Trust Workforce

Section 75 Group	***Southern Trust Workforce Profile as at 1 January 2021***	***Percentage***
Gender	Female Male	**85.1%** **14.9%**
Religion	Protestant Roman Catholic Neither	**35.6%** **56.7%** **7.7%**
Political Opinion	Broadly Unionist Broadly Nationalist Other Do Not Wish To Answer/Not Known	**9.7%** **10.1%** **7.8%** **72.4%**
Age	16-24 25-34 35-44 45-54 55-64 65+	**6.5%** **25.0%** **25.3%** **21.8%** **18.4%** **3.0%**
Marital Status	Single Married Not Known	**31.6%** **59.1%** **9.3%**
Dependent Status	Caring for a Child/Children / Dependant Older Person / Person With a Disability None Not Known	 **19.0%** **31.1%** **49.9%**
Disability	Yes No Not Known	**2.5%** **78.7%** **18.8%**
Ethnicity	Bangladeshi Black African Black Caribbean Black Other Chinese Filipino Indian Irish Traveller Mixed Ethnic	**0.02%** **0.21%** **0.02%** **0.02%** **0.1%** **0.4%** **0.72%** **0.02%** **0.12%**

	Pakistani White Not Known	**0.15%** **80.1%** **18.1%**
Sexual Orientation ***towards:***	Opposite Sex Same Sex Same and Opposite Sex Do Not Wish To Answer/Not Known	**57.3%** **1.0%** **0.1%** **41.6%**

2.3 Patients / Clients Affected

*All actual and potential patients/service users and visitors, in particular those with or suspected of having food allergies/intolerance - see table 2.4 for make-up of Southern Trust area population.

Section 75 Group	***Make up of Patients/Clients Affected***	***Percentage***
Gender	Female Male	***see note above**
Religion	Protestant Roman Catholic Other	
Political Opinion	Broadly Unionist Broadly Nationalist Other Do Not Wish To Answer/Not Known	
Age	0-15 16-24 25-44 45-64 65-84 85+	
Marital Status	Single Married/Civil Partnership Other/Not Known	
Caring Responsibility	Caring for a Child/Children/Dependant Older Person/Person(s) With a Disability None Not Known	
Disability	Yes No Not Known	
Ethnicity	Bangladeshi Black African Black Caribbean Black Other Chinese Filipino Indian Irish Traveller Mixed Ethnic Pakistani White Not Known	
Sexual Orientation *towards:*	Opposite Sex Same Sex Same and Opposite Sex Do Not Wish To Answer/Not Known	

2.4 Southern Trust's Area Population Profile – Census 2011

Section 75 Group	*Trust's Area Population Profile (Population of 358,034)*	*Percentage*
Gender	Female Male	**50.36** **49.64**
Religion	Protestant Roman Catholic Other	**39.15** **56.69** **4.16**
Political Opinion	Not collected	
Age	0-15 16-24 25-44 45-64 65-84 85+	**22.73** **12.25** **28.45** **23.40** **11.69** **1.48**
Marital Status (aged 16+ years)	Single Married/Civil Partnership Other	**34.99** **50.24** **14.77**
Dependent Status	Caring for a Child/Children/Dependant Older Person/Person(s) With a Disability	**11.34% of usually resident population provide unpaid care**
Disability	Yes No	**19.64** **80.36**
Ethnicity	Asian Other Bangladeshi Black African Black Caribbean Black Other Chinese Indian Irish Traveller Mixed Ethnic Group Other Pakistani White	**0.20** **0.01** **0.11** **0.01** **0.10** **0.22** **0.17** **0.15** **0.29** **0.16** **0.07** **98.51**
Sexual Orientation	Estimated 6-10% of persons identify as lesbian, gay, bisexual – *Source: 2012 report by Disability Action & Rainbow Project*	

(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. ***(NB: Use relevant statistical and qualitative data to complete the table below)***

Section 75 Category	***Details of Needs, Experiences and Priorities***	
	Staff	***Service Users***
Gender	The need to ensure allergens are listed against each menu item and available in respect of all other food and beverages served and declared on food sold in catering outlets and vending machines.	The need to identify food allergies as part of the admission process. The need to ensure allergens are listed against each menu item and available in respect of all other food and beverages served and declared on food sold in catering outlets and vending machines.
Age	As above	As above
Religion	As above	As above
Political Opinion	As above	As above
Marital Status	As above	As above
Dependent Status	As above	As above
Disability	As above. The need to ensure equality of access to information i.e. that the policy/menus etc. can be made available in different formats, where required.	As above. The need to ensure equality of access to information i.e. that the policy/menus etc. can be made available in different formats, where required.
Ethnicity	As above. The need to ensure equality of access to information i.e. that the policy/menus etc. can be made available in different languages, where required.	As above. The need to ensure equality of access to information i.e. that the policy/menus etc. can be made available in different languages, where required.
Sexual Orientation	As above	As above

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

This policy has been developed in consultation with the appropriate internal and external stakeholders including the Trust's Food Hygiene and Safety Committee, Care Directorates, Dietitians, Speech and Language Therapy, Occupational Health and Environmental Heath.

(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			None
Age			None
Religion			None
Political Opinion			None
Marital Status			None
Dependent Status			None
Disability			None
Ethnicity			None
Sexual Orientation			None

(4.2) Are there opportunities to better promote equality of opportunity for people within Section 75 equality categories?	
Section 75 category	***Please provide details***
Gender	N/A
Age	N/A
Religion	N/A
Political Opinion	N/A
Marital Status	N/A
Dependent Status	N/A
Disability	N/A
Ethnicity	N/A
Sexual Orientation	N/A

(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		
Good relations category	***Details of policy/proposal impact***	***Level of impact Minor/major/none***
Religious belief	N/A	None
Political opinion	N/A	None
Racial group	N/A	None

(4.4) Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?	
Good relations category	***Please provide details***
Religious belief	N/A
Political opinion	N/A
Racial group	N/A

(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?

N/A

(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

Article	Positive impact	Negative impact = human right interfered with or restricted	Neutral impact
Article 2 – Right to life	√		
Article 3 – Right to freedom from torture, inhuman or degrading treatment or punishment			√
Article 4 – Right to freedom from slavery, servitude & forced or compulsory labour			√
Article 5 – Right to liberty & security of person			√
Article 6 – Right to a fair & public trial within a reasonable time			√
Article 7 – Right to freedom from retrospective criminal law & no punishment without law			√
Article 8 – Right to respect for private & family life, home and correspondence.			√
Article 9 – Right to freedom of thought, conscience & religion			√
Article 10 – Right to freedom of expression			√

Article	Positive impact	Negative impact = human right interfered with or restricted	Neutral impact
Article 11 – Right to freedom of assembly & association			√
Article 12 – Right to marry & found a family			√
Article 14 – Prohibition of discrimination in the enjoyment of the convention rights			√
1st protocol Article 1 – Right to a peaceful enjoyment of possessions & protection of property			√
1st protocol Article 2 – Right of access to education			√

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.

The aim of the policy is to reduce the risk of a service user, staff or visitor experiencing an adverse reaction from a known food allergen found in food or beverages.

(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)*

<table>
<tr><td rowspan="2">Major impact</td><td rowspan="2"></td><td colspan="2">EQIA Required? (Delete as appropriate)</td></tr>
<tr><td></td><td>No</td></tr>
<tr><td rowspan="2">Minor impact</td><td rowspan="2"></td><td>Mitigation Required</td><td>Alternative Policy Required</td></tr>
<tr><td>No</td><td>No</td></tr>
<tr><td>No impact</td><td>√</td><td colspan="2">Screened Out</td></tr>
</table>

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

No equality implications identified - see mitigations at 3.1 above.
The aim of the policy is to reduce the risk of a service user, staff or visitor experiencing an adverse reaction from a known food allergen found in food or beverages.

(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	
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 Food Hygiene and Safety Committee will be responsible for:

- Monitoring and reviewing food allergy related incidents and overseeing implementation of remedial action plans where appropriate.
- Monitoring Food Safety training compliance across the Trust.

Approved Lead Officer: **Anita Carroll**

Position: **Assistant Director of Functional Support Services**

Email: **Anita.carroll@southerntrust.hscni.net**

Telephone No: **02837 562847**

Date: **07.10.2021**

Policy/proposal screened by: **Valerie Adams**

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.