

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?

Revised

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

The aim of this policy is to reduce the risk of anyone experiencing an adverse reaction from a known or suspected food allergen.

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

All Section75 categories with or suspected of having food allergies/intolerances are expected to benefit from this policy.

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

Implemented locally by the SHSCT to assist with compliance of 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 kitchens
- 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, patients/service users, and also staff, visitors, contractors and members of the public using Trust catering outlets

(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 and Safety 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
- Natasha's Law (2021) / PPDS (Prepacked for Direct Sale) Food labelling requirements
- 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 (Updated with 2024 data)

* All actual and potential staff who have direct service user contact, staff involved in handling food and beverages, and also staff themselves with or suspected of having food allergies/intolerances.

Section 75 Group	Southern Trust Workforce Profile as at 1 January 2024	Percentage
Gender	Female	85.1%
	Male	14.9%
Religion	Protestant	34.2%
	Roman Catholic	56.2%
	Neither	9.6%
Political Opinion	Broadly Unionist	9.1%
	Broadly Nationalist	9.8%
	Other	7.6%
	Do Not Wish To Answer/Not Known	73.6%
Age	16-24	8.1%
	25-34	23.3%
	35-44	27.2%
	45-54	20.6%
	55-64	17.2%
	65+	3.7%
Marital Status	Single	32.5%
	Married	55.8%
	Not Known	11.7%
Dependent Status	Caring for a Child/Children / Dependant Older Person / Person With a Disability	15.3%
	None	31.2%
	Not Known	53.5%
Disability	Yes	2.5%
	No	73.9%
	Not Known	23.6%
Ethnicity	Bangladeshi	0.01%
	Black African	0.36%
	Black Caribbean	0.01%
	Black Other	0.03%
	Chinese	0.09%
	Filipino	0.54%
	Indian	1.16%
	Irish Traveller	0.02%
	Mixed Ethnic	0.2%
	Pakistani	0.15%
	White	74.29%
Not Known	23.15%	
Sexual Orientation towards:	Opposite Sex	57.2%
	Same Sex	1.1%
	Same and Opposite Sex	0.3%
	Do Not Wish To Answer/Not Known	41.4%

2.2 Patients / Clients Affected / Southern Trust's Area Population Profile – Census 2021

*All actual and potential patients/service users, also visitors, contractors and members of the public using Trust facilities, with or suspected of having a food allergy/intolerance

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	Single	28.1
	Married/Civil Partnership	37.7
	Other	34.2
Caring Responsibility	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 towards:	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.
(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	This policy will affect anyone with a suspected or known food allergy/intolerance	This policy will affect anyone with a suspected or known food allergy/intolerance
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. 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. 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. 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. 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.

The policy has been revised in consultation with the Trust's Food Hygiene and Safety Committee and the Head of Occupational Health. The revised policy has been approved by Policy Scrutiny Committee.

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 will not affect any specific group.	The policy will not affect any specific group.	None
Age	As above	As above	None
Religion	As above	As above	None
Political Opinion	As above	As above	None
Marital Status	As above	As above	None
Dependent Status	As above	As above	None
Disability	As above	As above	None
Ethnicity	As above	As above	None
Sexual Orientation	As above	As above	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	No
Age	No

(4.2) Are there opportunities to better promote equality of opportunity for people within Section 75 equality categories?	
Section 75 category	Please provide details
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		
Good relations category	Details of policy/proposal impact	Level of impact Minor/major/none
Religious belief	No impact on good relations between people of different religious belief, political opinion or racial groups.	None
Political opinion	As above	None
Racial group	As above	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	As above
Racial group	As above

(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?

Any training will take consideration of staff with disabilities to ensure full participation of all involved. The Trust is committed to ensuring it meets its obligations within the Disability Discrimination Act 1995 and the United Nations Convention on the Rights of People with Disabilities. The Trust has a number of policies/plans in place including a Disability Action Plan as well as staff training, aimed at encouraging disabled people participation in public life and promoting positive attitudes towards disabled people including staff with disabilities. The Trust is committed to Equal Opportunities.

(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 11 – Right to freedom of assembly & association			√

Article	Positive impact	Negative impact = human right interfered with or restricted	Neutral impact
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 Trust is committed to the principle that everyone has the fundamental right to the highest attainable standard of physical and mental health. In order to promote awareness of Human Rights, Trust staff will continue to receive relevant human rights training.

(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)*

Major impact		EQIA Required? <i>(Delete as appropriate)</i>	
		Yes	No

Minor impact	✓ positive	Mitigation Required	Alternative Policy Required
		Yes/No	Yes/No

No impact		Screened Out
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(7.2) Please give reasons for your decision and detail any mitigation or alternative policies considered.

The Trust has carried out an equality screening of the policy and has not identified a potential adverse impact for the nine equality categories. It is considered that this policy will have a minor positive impact.

(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?

- Feedback from service users and staff
- Food Safety Audits
- Food Safety Incidents
- Feedback from Environmental Health Inspections

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Date: 02/07/2024

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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.