

**GPhC Equality Guidance for Pharmacy Owners**

**Royal Pharmaceutical Society response**

1. **Thinking about the structure and language of the guidance, do you think it is easy to understand?**

Yes

**2. Thinking about the structure and language of the guidance, do you think it is easy to apply?**

Yes

**3. Please give comments explaining your answers to the two questions above.**

The document is well written and structured making it easy to understand. The 5 principles make it easy to identify which area the guidance is focusing on. However, from the titles for each of the principles it is not clear which apply to pharmacy staff as employees, as there is a lot of focus on patients and members of the public.

The document is structured in a way that it would be easy to apply working through each principle and the case studies are helpful in bringing to life some of the principles. However, in some of the case studies some key details are missing. If these are shared in more detail on the knowledge hub could a link be put into the case studies box for people to read more about them or who they can contact to find out more?

The glossary and signposting to organisations for further information is very useful.

**4. Thinking about the areas covered in the guidance, do you think we have missed out anything important?**

Yes

**5. If ‘Yes’, please describe the areas we have missed.**

The document does not fully consider the role and impact of pharmacy owners on their staff, particularly when considering the working environment and accessibility of the pharmacy environment. The focus is on patients and members of public however the feedback we have received at the RPS is that the working environment does not always take into considerations different needs of staff such as lower dispensing benches or room for a wheelchair in the dispensary.

In the introduction the following statement has been made:

*‘’As far as your staff are concerned, your duty to make reasonable adjustments for them is not anticipatory. This means that you only have to make adjustments if you are aware that a worker has a disability. For example, this may be someone who is applying for a job at your pharmacy and needs an adjustment to help them through the application process. Or an existing member of your team may develop a disability.’’*

This statement demonstrates the minimum to not break the law, however it does not consider the future workforce. It could be caveated with if you’re considering redesigning your premises you should consider making it accessible as possible to encourage a workforce with a range of abilities.

There are several references for the need for an equality policy, however there is no mention of ensuring it is implemented fairly across all protected characteristics which could raise a concern that having an equality policy may be considered a tick box exercise. This also applies to equality training, there would need to be continual review and monitoring of the interventions to see if equality training and an equality policy is creating a culture of belonging as desired.

Principle 1 Identifying and managing risk; with regards to section 1.2 it should be made clear what level of details should be recorded as a written document or report is not always necessary. This will support pharmacy owners ensure they are recording the correct information and ensure consistency.

Principle 1.3**. T**here is reference to fairly promoting staff but it does not mention treating staff fairly day to day without discrimination which is also very important.

Principle 2.3 2.4, 2.5 – the example of Empowered staff and an open learning culture, within this example the complainant reported experiencing severe distress and self harming due to the incessant harassment, the behaviour resulted in an apology and equality training. Self-harming and severe distress is a very severe reaction and the consequences to the pharmacist do not seem fair to address the issue. The severity of to the victim could be lessened or an appropriate level of response and consequence be demonstrated to the pharmacist.

Principle 3. The focus is for the safety of patients and members of public, however there is no mention of employees. We believe there is a requirement to create a safe working environment for staff free from discrimination and taking into consideration their needs such as mobility or accessibility.

From the guidance it is unclear of who supports employees in the instance pharmacy owners are not meeting their obligations to staff, patients or members of the public to meet the equality standards set out in this guide. This should be clarified.

It is also really important to highlight that pharmacy owners should also consider themselves within this guidance as much as the pharmacy owner has the responsibility in creating a culture of belonging they also need to be treated fairly and their needs or any reasonable adjustments considered as part of the working environment.

Within the references section under the RPS, the [RPS Inclusion and Wellbeing Pledge](https://www.rpharms.com/pledge) could also be included for pharmacy owners and individuals to demonstrate their commitment to create an inclusive culture for both their employees and patients.

**6. Do you think our proposals will have a positive or negative impact on: each of the following groups?**

**• Patients and the public -** positive

**• Pharmacy staff –** potentially positive

**• Pharmacy owners -** positive

**7. Do you think our proposals will have a positive or negative impact on individuals or groups who share any of the following protected characteristics (as listed in the Equality Act 2010)?**

 **• age -** positive

 **• disability -** positive

 **• gender reassignment -** positive

 **• marriage and civil partnership** – n/a

**• pregnancy and maternity** - positive

**• race -** positive

**• religion or belief** - positive

 **• sex** - positive

**• sexual orientation** - positive

**8. Please give comments explaining your answers to the two impact questions above. Please describe the individuals or groups concerned and the impact you think our guidance would have.**

The guidance would have a positive impact on patients, the public, pharmacy staff and pharmacy owners if implemented correctly.

Currently the guidance has a larger focus on being more inclusive for patients and members of the public, however staff play a big role in delivering high standards of patient care. If they do not work in an environment where they feel they belong, and their needs are not considered this will affect patient care. There is strong evidence showing that having a diverse and inclusive work environment where individuals feel like they belong and can be their authentic selves has a positive impact on productivity and patient care. Therefore, this document will benefit both pharmacy staff and owners if the needs of the pharmacy staff are also considered.

On the whole implementing this guidance will have a positive impact across each of the protected characteristics; however, there is a gap in anticipating the needs of pharmacy staff which could be more clearly articulated throughout the document.